

Phone 833-1620

**All claims and returned goods
MUST be accompanied by this bill**

206

Thank You

INVOICE

SECRET

VIA

22 Dec 21/80

pd
9 | 22 | 79

Thank You!

0036-0091

WHITNEY BARREL CO. INC.
 Complete Drum Reconditioning
 Established 1898
 All Types of Steel Drums-Fibre Barrels-Purchases-Sales
 256 Salem Street Woburn, Mass. 01801
 Phone 933-4520 - 21

CUSTOMER'S ORDER NO.		PHONE		DATE 8-9-79	
NAME <i>Monsanto</i>					
ADDRESS <i>Exeter, Mass</i>					
SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT.	MOSE. RET'D.
PAID OUT					
QTY	DESCRIPTION			PRICE	AMOUNT
164	<i>Recond. 87 gal Fibre barrel for A.C.L. Dept.</i>				
<i>84</i>	<i>Reconders</i>				
	<i>50</i>				
	<i>3 84 2</i>				
	<i>140 0 4</i>				
	<i>28 0 0</i>				
	<i>94</i>				
RECEIVED BY				TAX	
				TOTAL	

2180

All claims and returned goods
 MUST be accompanied by this bill.

SERIES 610

Thank You

REDACTED

0036-0092

WASHDC MAG - CHUSSETTS 01801
 2nd Ave. Boston MA 02101
 WASHDC MAG - CHUSSETTS 01801

151A 313-4520

TERMS:

[illegible]

Thank You

WHITNEY BARREL CO. INC.

Complete Drum Reconditioning

Established 1898

All Types of Steel Drums-Fibre Barrels-Purchases-Sales

256 Salem Street Woburn, Mass. 01801

Phone 933-4520 - 21

CUSTOMER'S ORDER NO.		PHONE		DATE <i>7-27-79</i>		
NAME <i>Monsanto</i>						
ADDRESS <i>Everette, Mass</i>						
SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT.	MDSE. RET'D.	PAID OUT
QTY	DESCRIPTION				PRICE	AMOUNT
<i>100</i>	<i>used Fibre barrels</i>				<i>3⁰⁰</i>	
	<i>for Lymer Dept.</i>					
RECEIVED BY						

All claims and returned goods
MUST be accompanied by this bill.

2169

SERIES 610

Thank You

REDACTED

0036-0094

Phone 933-4820 • 21

Form 840-2 Available from  Townsend, Mass. 01469



Tara K. Callahan
Direct: (314) 259-2457
tkcallahan@bryancave.com

March 24, 2004

VIA FEDERAL EXPRESS

Martha Bosworth
Enforcement Coordinator
U.S. Environmental Protection Agency
Office of Site Remediation and Restoration
One Congress Street, Suite 1100
Boston, MA 02114

ATTN: Wells G&H Case Team

Re: CERCLA 104(e) Request for Information Concerning Whitney Barrel
Company at the Wells G & H Superfund Site in Woburn, MA

Dear Ms. Bosworth:

This letter and its attachments are in response to the U.S. Environmental Protection Agency's CERCLA § 104(e) request for information addressed to Pharmacia Corporation regarding the Whitney Barrel Company at the Wells G & H Superfund Site in Woburn, Massachusetts (the "Site"). Due to contractual obligations and despite the fact that the subject matter of the request relates to historic Pharmacia and/or Solutia, Inc. operations, Monsanto Company is responding to this request on behalf of Pharmacia Corporation. Pharmacia received EPA's 104(e) request on December 22, 2004. Via verbal agreement and written confirmation on December 23, 2003 and March 29, 2004, EPA granted Monsanto's request for an extension, through April 9, 2004, in which to submit a response.

For clarity's sake, and as a supplement to the answers to Questions #1 and #2 of the Information Request, an overview of the corporate history of Monsanto Company, Solutia Inc., and Pharmacia Corporation is in order. During the 1950-1985 time frame, the corporate entity then known as "Monsanto Company" had varied operations throughout the U.S. In September 1997, the corporate entity then known as "Monsanto Company" spun off its chemical business into a separate company, Solutia Inc. ("Solutia"), which is now an independent publicly-held company. As part of this 1997 transaction, certain assets and liabilities, along with related records, associated with the historic chemical business were transferred to, and expressly assumed by, Solutia, which was required to indemnify the company then known as Monsanto Company for certain liabilities, including liabilities associated with the

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And Bryan Cave,
A Multinational Partnership,
London

chemicals business. At the time that Solutia was spun off, all existing documentation on the sites/facilities relevant to EPA's request was transferred to Solutia. On December 17, 2003, Solutia filed for bankruptcy protection and is no longer fulfilling certain of its obligations to Pharmacia under the Distribution Agreement. New Monsanto therefore is responding to this request as agent to Pharmacia.

In March 2000, Pharmacia & Upjohn, Inc. merged into a subsidiary of the entity then known as "Monsanto Company." The entity known as "Monsanto Company" then changed its name to Pharmacia Corporation ("Pharmacia"). Immediately following that renaming, the newly named Pharmacia changed the name of another completely separate subsidiary, which it had newly incorporated in 2000, to "Monsanto Company." Generally speaking, Pharmacia then transferred certain agricultural assets and liabilities, and related records, of the pre-merger old "Monsanto Company" to the newly created Monsanto Company. In October 2000, Pharmacia offered approximately 15% of its ownership interest in the new Monsanto Company to the public and then in August 2002 distributed the rest of its ownership interest in the new Monsanto Company to Pharmacia shareholders. Pursuant to a September 1, 2000 Separation Agreement between Pharmacia and the new Monsanto Company, the new Monsanto promised to indemnify and defend Pharmacia with respect to certain matters. It is pursuant to this Separation Agreement that New Monsanto is now responding to this Information request for Pharmacia. While sharing a history, Pharmacia Corporation, the new Monsanto Company, and Solutia Inc. are completely independent companies.

On April 15, 2003, Pfizer Inc. acquired Pharmacia, which is now wholly owned by Pfizer rather than being a publicly-held corporation. Unless indicated otherwise, the term "New Monsanto" as used in this cover letter and Attachment A refers to the entity currently operating under the name "Monsanto Company" which was incorporated in 2000. The term "Old Monsanto" refers to those historic operations of Pharmacia that were conducted under the name of "Monsanto" prior to the March 31, 2000 merger.

On behalf of Pharmacia, New Monsanto objects to the questions contained in the request for three reasons. First, the request requires Pharmacia to provide information regarding facilities it does not own or control. As a result of the corporate transactions described above, Pharmacia is not in possession of the documents of any facilities that may have a connection to the Site. Second, New Monsanto disagrees with EPA's overly broad assumption of authority, which EPA asserts is conferred under CERCLA and RCRA, and New Monsanto further objects to the overly broad scope of the information sought in this 104(e) request, as well as the unreasonable time period covered, going back more than fifty years. Finally, the request seeks information already provided to EPA. The request seeks information regarding Pharmacia's facilities in Massachusetts, Maine, New Hampshire and Rhode Island. Of all its former facilities, only two are located in the four states subject to EPA's present request. These two facilities, the Everett and Indian Orchard facilities are both located in Massachusetts and were the subject of information sought by EPA's previous 104(e) information requests related to the Iron Horse Park Superfund Site in Billerica, Massachusetts. Consequently,

Martha Bosworth

March 24, 2004

Page 3

Bryan Cave LLP

both Pharmacia and Solutia previously provided EPA with information on these two facilities in their responses to EPA's 104(e) Iron Horse information requests.

Despite our objections, in the interest of preserving New Monsanto's relationship with the EPA and given New Monsanto's policy of cooperation with government agencies, on behalf of Pharmacia, New Monsanto is responding to EPA's request while at the same time reserving all objections and defenses to EPA's statement of authority. Pharmacia's response, prepared by New Monsanto, is included as Attachment A. In order to provide EPA with a timely response to its current request, and taking into consideration the fact that New Monsanto (and/or Solutia) has previously provided EPA with information regarding the Everett and Indian Orchard facilities, this response shall be limited to any information related specifically to Whitney Barrel. Notwithstanding the foregoing, to the extent that our investigation has identified information relevant to questions 3, 4, 5, and 6 of the request, we will attempt to summarize such information and/or attach responsive documents to our response. Please note that responses to specific questions are based solely on information gleaned from the attached documents.

Because the Everett plant documents are maintained by Solutia in or near St. Louis and the Indian Orchard documents are maintained at Solutia's plant in Massachusetts, New Monsanto organized two teams of personnel to independently investigate and review documents at each plant. Accordingly, New Monsanto's response to the each question (beginning with Question #3) of the 104(e) Information Request is divided into two sections: Everett answers and Indian Orchard answers, with each section prepared by the different teams. As a result, Everett documents responsive to the request are bates numbered Everett 00001 – Everett 05554. Additionally, these documents are grouped into red weld folders by question number and further divided by the sub-question to which they respond. Indian Orchard documents are bates numbered IndOrch 1- IndOrch 26498 and will be shipped under separate cover.

New Monsanto's time intensive search for documents has not uncovered any information connecting the Everett and Indian Orchard facilities to Whitney Barrel. New Monsanto conducted its good faith investigation for information by reviewing Everett and Indian Orchard documents in Solutia's possession and control, as well as contacting the library in Everett, MA in the hopes of finding records on the Everett facility. New Monsanto contacted Solutia to make arrangements to review its documents relating to the Everett facility. Solutia searched its Environmental Insurance Litigation database for the term "Everett" and responded to New Monsanto's request by providing a 1000 page database printout listing storage file names that may relate to the 104(e) request. The database printout lists only file folders, with no specific information on the type of documents in the files or the dates of such documents. After reviewing the database printout, New Monsanto identified files located in over 100 boxes of materials that it wished to review. New Monsanto was given access to and began its review of the boxes on March 5, 2004. New Monsanto has devoted at least four individuals to its initial Everett document review: Wanda Oldani and Kathy Conard of Bryan Cave and Diana Hutter and Ann Clark from New Monsanto. As of Monday, April 5, New Monsanto had reviewed approximately 146 boxes. There are 4 additional boxes that New Monsanto is waiting to

0036-0098

Martha Bosworth
March 24, 2004
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Bryan Cave LLP

review. In the event New Monsanto discovers additional responsive information from its review of the remaining boxes, New Monsanto shall supplement this response.

The majority of the files for the Indian Orchard Plant are located at the plant in an archive library. Consequently, New Monsanto assembled a team to travel to Solutia's Indian Orchard plant in Massachusetts and review documents located in 65 file cabinets stored on site. The following individuals reviewed documents at Indian Orchard: Matthew Fleming, Raymond Giraud, and Margaret Starczyk.

At this time, New Monsanto has not found any information that establishes a connection between Pharmacia and the Site, nor any business relationship between Pharmacia and Whitney Barrel. Because there is no information or documents establishing Pharmacia's disposal or arrangement for disposal of CERCLA hazardous substances at the Site, Pharmacia has no potential CERCLA liability for the Site.

Best regards,



Tara K. Callahan

TKC
Enclosures

cc: Molly Shaffer
Phil Karmel

0036-0099

ATTACHMENT A

**New Monsanto's Response on Behalf of Pharmacia Corporation
to US EPA's CERCLA § 104(e) Request for Information
Regarding Whitney Barrel Company at the Wells G & H Superfund Site in Woburn, MA**

I. General Information About Respondent

NOTE: All questions in this section refer to the present time unless otherwise indicated.

a. Provide the full legal name and mailing address of the Respondent.

RESPONSE

As more fully explained in the cover letter to this response, New Monsanto is responding to this information request on behalf of Pharmacia Corporation solely due to contractual obligations it has with Pharmacia Corporation, the entity to which this request was sent. As such, the term "Respondent" shall be limited to New Monsanto at the address given below. Nonetheless, New Monsanto shall provide responses solely related to Old Monsanto/Pharmacia historic chemical operations. This response shall not cover any Pharmacia or Pfizer operations unrelated to Old Monsanto.

Based on the foregoing, the Respondents shall be:

*Monsanto Company
800 North Lindbergh Blvd.
St. Louis, Missouri 63167*

*Pharmacia Corporation
1751 Lake Cook Road
Deerfield, Illinois 60015*

b. For each person answering these questions on behalf of Respondent, provide:

- i. full name;
- ii. title;
- iii. business address; and
- iii. business telephone number.

RESPONSE *Mary M. Shaffer, Assistant General Counsel - Environmental
Monsanto Company
800 N. Lindbergh Blvd. (E2NK)
St. Louis, MO 63167
(314) 694-3883*

*Diana M. Hutter, Paralegal
Monsanto Company
800 N. Lindbergh Blvd. (E2NK)*

*St. Louis, MO 63167
(314) 694-3312*

*Steven J. Poplawski
Bryan Cave LLP
211 North Broadway, Suite 3600
St. Louis, MO 63102
(314) 259-2610*

*Philip E. Karmel
Bryan Cave LLP
1290 Avenue of the Americas
New York, NY 10104
(212) 541-2311*

*Tara K. Callahan
Bryan Cave LLP
211 North Broadway, Suite 3600
St. Louis, MO 63102
(314) 259-2457*

*Matthew Fleming
N.Y. Bar Admission Pending
Bryan Cave LLP
1290 Avenue of the Americas
New York, NY 10104
(212) 541-3004*

c. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including any legal notices, please so indicate here by providing that individual's name, address, and telephone number.

RESPONSE *Mary M. Shaffer, Assistant General Counsel - Environmental
Monsanto Company
800 North Lindbergh Blvd. (E2NK)
St. Louis, MO 63167
Telephone: 314-694-3883*

d. Provide the names of all Superfund sites in Region I (New England) for which Respondent has received a 104(e) Request for Information Letter from EPA.

RESPONSE *The Monsanto Company that exists at the present time, the Respondent (for the purposes of this response, also referred to as "New Monsanto"), was*

originally incorporated on February 9, 2000 with the name "Monsanto Ag Company" and was renamed on March 31, 2000, to "Monsanto Company."

During the 1950 to 1985 time frame, the corporate entity then known as "Monsanto Company" had varied operations throughout the U.S. In September 1997, the corporate entity then known as "Monsanto Company" spun off its chemical business into a separate company, Solutia Inc. ("Solutia"), which is now an independent publicly-held company. As part of this transaction, certain assets and liabilities, along with related records, associated with the historic chemical business were transferred to Solutia. For the Agency's convenience, we are including the following list of Superfund sites in Region I for which Solutia has indicated it has received a 104(e) Request for Information Letter from the EPA. This list was compiled by Solutia for its response to previous 104(e) requests from the Agency. As such, sites included on this list may have a connection to Old Monsanto operations.

ANGELILLO	SOUTHINGTON, CT
BEACON HEIGHTS	BEACON FALLS, CT
BEEDE WASTE OIL	PLAISTOW, NH
CANNONS ENGINEERING CORP. 1	BRIDGEWATER, MA
CANNONS ENGINEERING CORP. 2	PLYMOUTH, MA
CANNONS ENGINEERING CORP. 3	NASHUA, NH
CANNONS ENGINEERING CORP. 4	LONDONDERRY, NH
CHARLES GEORGE LAND RECLAMATION	TYNGSBOROUGH, MA
CHESNUTIS	BEACON FALLS, CT
CRANSTON SANITARY LANDFILL	CRANSTON, RI
DAVIS GSR LANDFILL	GLOUCESTER, RI
DAVIS LIQUID WASTE	SMITHFIELD, RI
EVERETT DRUMS	EVERETT, MA
GALLUP'S QUARRY	PLAINFIELD, CT
INDUSTRI PLEX (WOBURN)	WOBURN, MA
IRON HORSE A/K/A SCHAFER LANDFILL	BILLERICA, MA
KINGSTON STEEL DRUM	KINGSTON, NH
LANDFILL & RESOURCE RECOVERY	NORTH SMITHFIELD, RI
LAUREL PARK INC.	NAUGATUCK, CT
MYSTIC RIVER	EVERETT, MA
M. T. SULLIVAN	CHICOPEE, MA
NEW BEDFORD	NEW BEDFORD, MA
NYANZA CHEMICAL WASTE DUMP	ASHLAND, MA
OLD SOUTHINGTON LANDFILL	SOUTHINGTON, CT
OTTATI & GOSS INC.	KINGSTON, NH
PETERSON-PURITAN OPERABLE UNIT 2 SITE (J.M. MILLS LANDFILL)	PROVIDENCE, RI

PICILLO WASTE DISPOSAL	COVENTRY, RI
PSC RESOURCES	PALMER, MA
SILRESIM CHEMICAL	LOWELL, MA
SOLVENTS RECOVERY OF NEW ENGLAND	SOUTHINGTON, CT
SOUTH HADLEY LANDFILL	SOUTH HADLEY, MA
SULLIVAN'S LEDGE	NEW BEDFORD, MA
SUTTON BROOK (ROCCO LANDFILL)	TEWKSBURY, MA
WESTERN SAND & GRAVEL	BURRILVILLE, RI

2. Respondent's Legal Status

NOTE: All questions in this section refer to the present time unless otherwise indicated.

- a. If the Respondent has ever done business under any other name;
- list each such name; and
 - list the dates during which such name was used by Respondent.

RESPONSE

New Monsanto Company was originally incorporated on February 9, 2000 with the name "Monsanto Ag Company" and was renamed on March 31, 2000, to "Monsanto Company."

- b. If Respondent is a corporation, provide:
- the date of incorporation;
 - state of incorporation; and
 - agent for service of process.

RESPONSE

New Monsanto

- February 9, 2000*
- Delaware*
- CT Corporation System*

Pharmacia

- March 31, 2000*
- Delaware*
- CT Corporation System*

- c. If Respondent was a business entity other than a corporation, provide:
- the type of organization (sole proprietorship, partnership, trust, etc.)

- ii. the date the business began; and
- iii. owner, managing partner, or other equivalent person in charge.

RESPONSE N/A

d. If Respondent is, or was at any time during the period being investigated, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the nature of each such corporate relationship, including but not limited to:

- i. a general statement of the nature of the relationship;
- ii. the dates such relationship existed;
- i. the percentage of ownership of Respondent that is held by such other entity; and
- ii. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities.

RESPONSE *The following is an overview of the corporate history of Monsanto Company, Solutia Inc., and Pharmacia Corporation.*

During the 1950 to 1985 time frame, the corporate entity then known as "Monsanto Company" had varied operations throughout the U.S. In September 1997, the corporate entity then known as "Monsanto Company" spun off its chemical business into a separate company, Solutia Inc. ("Solutia"), which is now an independent publicly-held company. As part of this transaction, certain assets and liabilities, along with related records, associated with the historic chemical business were transferred to, and expressly assumed by, Solutia, which was required to indemnify Monsanto for certain liabilities, including liabilities associated with the chemical business.

In March 2000, Pharmacia & Upjohn, Inc. merged into a subsidiary of the entity then known as "Monsanto Company." The entity known as "Monsanto Company" then changed its name to Pharmacia Corporation ("Pharmacia"). Immediately following that renaming, the newly named Pharmacia changed the name of another completely separate subsidiary, which it had incorporated in 2000, to "Monsanto Company." Generally speaking, Pharmacia then transferred certain agricultural assets and liabilities, and related records, of the pre-merger old "Monsanto Company" to the new Monsanto Company.

In October 2000, Pharmacia offered approximately 15% of its ownership interest in the new Monsanto Company to the public and then in August 2002 distributed the rest of its ownership interest in the new Monsanto Company to Pharmacia shareholders. While sharing a history, Pharmacia Corporation, Monsanto Company, and Solutia Inc. are completely independent companies.

On April 15, 2003, Pfizer Inc. acquired Pharmacia, which is now wholly owned by Pfizer rather than being a publicly-held corporation.

Unless indicated otherwise, the term "New Monsanto" as used in this response refers to the entity currently operating under the name "Monsanto Company" which was incorporated in 2000. The term "Old Monsanto" refers to those historic operations of Pharmacia that were conducted under the name of "Monsanto" prior to the March 31, 2000, merger.

*Pfizer Inc.
235 East 42nd Street
New York, NY 10017-5755*

*Pharmacia Corporation
100 Route 206 North
Peapack, NJ 07977*

e. Identify all of Respondent's predecessors-in-interest and provide a description of the relationship between Respondent and each of those predecessors-in-interest.

RESPONSE

See response to Question #2d above.

f. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:

- iii. the titles and dates of the transactions and copies of documents that embody the terms of such transactions (i.e., purchase agreements, merger and dissolution agreements, etc.);
- iv. the identities of the seller, buyer, and any other parties to such transactions;
- v. a brief statement describing the nature of the asset purchases or mergers; and
- vi. a brief statement describing and copy(s) of documents embodying any/all indemnification agreements.

RESPONSE

See Response to Question #2d above.

g. If Respondent has filed for bankruptcy, provide:

- i. the U.S. Bankruptcy Court in which the petition was filed;
- ii. the docket numbers of such petition;
- iii. the date the bankruptcy petition was filed;
- iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
- v. a brief description of the current status of the petition.

RESPONSE *N/A*

3. Respondent's Operations

NOTE: All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated.

ALSO NOTE: All questions in this Section refer to facilities owned or operated by the Respondent within Massachusetts, Rhode Island, New Hampshire or Maine and to any other facility owned or operated by Respondent which had any business or other contractual relationship with Whitney Barrel Company. **Please note that it is not necessary to identify or provide information about any facilities that are engaged solely in clerical/office work.**

a. Provide the complete addresses of Respondent's plants and other buildings or structures where Respondent carried out its operations.

RESPONSE *New Monsanto has identified no facilities associated with Old Monsanto's agricultural operations during the above referenced period of investigation (1950-1985). However, the following facilities are associated with Old Monsanto's historic chemical business of which certain assets and liabilities, along with related records associated with the historic chemical business, were transferred to Solutia:*

*Everett Plant (Closed 1992)
Mystic View Road
Everett, Massachusetts 02149*

*Bircham Bend Plant nka Indian Orchard Plant
190 Grochmal Avenue
Indian Orchard, Massachusetts 01151*

*Springfield Plant nka Indian Orchard Plant
730 Worcester Street
Indian Orchard, Massachusetts 01151*

b. Provide a brief description of the nature of Respondent's operations at each location including:

- i. the date such operations commenced and concluded;
- ii. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location; and
- iii. the type of products manufactured, recycled, recovered, treated or otherwise processed in these operations.

RESPONSE

Everett Plant - Acquired by Old Monsanto in 1929 from the Merrimac Chemical Company of Boston. The plant was closed in 1992. The Everett plant produced water treatment agents, surface active agents, De Quest compounds, acids, CYA, and organo-

phosphate specialties, plasticizers and paper chemicals. See documents attached a Tab 3b for further information regarding plant operations.

Springfield Plant - Acquired by Old Monsanto in 1938 from the Fiberloid Corporation. In 1982, the Springfield plant, together with the Bircham Bend plant, became Old Monsanto's Indian Orchard plant. In late 1995, Old Monsanto sold its styrenics plastics business to Bayer A.G. of Germany. In January of 2003, Solutia sold the resin business to UCB. Solutia currently operates this facility. The Springfield plant produced Lustrex polystyrene, phenolic resins and amino resins, Lustran ABS/SAN polymers, polyvinyl butyral sheet, formaldehyde and mineral reinforced nylon plastics.

Bircham Bend Plant - When Old Monsanto acquired the Fiberloid Corporation in 1938, it acquired 50% of Shawinigan Resins Corporation (SRC). When the remaining 50% was acquired in 1963, SRC became a wholly-owned subsidiary of Old Monsanto. In 1965, SRC became part of the Plastics Products & Resins Division and the Shawinigan name was discontinued. The SRC plant near Springfield, MA became Old Monsanto's Bircham Bend plant, which became a part of Old Monsanto's Indian Orchard facility in 1982. The Bircham Bend plant produced vinyl acetate-based resins.

c. Enclosure F provides a list of chemical constituents conclusively identified to date at the Site. For each facility identified in 3.a above, identify, to the best of your knowledge, any chemical constituents listed in Enclosure F that:

- i. would have been produced, processed, or used in connection with facility operations; or
- ii. would have been present in materials produced, processed, or used in connection with facility operations.

RESPONSE

Everett Plant – See marked copy of Enclosure F, attached at Tab 3c.

Indian Orchard – The final draft of the 1991 RCRA Facility Assessment provides an overview of the chemical constituents produced at the Indian Orchard Facility. Specifically, documents with Bates numbers 48 and 57-64 provide as follows:

Major manufacturing operations on the Monsanto site have included the production of: cellulose nitrate, cellulose acetate, polyvinyl butyral, polyvinyl butyral sheeting, polyvinyl formal, phenol/formaldehyde resin, polyvinyl acetate, polystyrene, polyvinyl butyral dispersion, melamine/formaldehyde resins, urea/formaldehyde resins, formaldehyde, polyvinyl chloride, polyvinyl alcohol, and polyvinyl acetate multipolymer solutions.

Polyvinyl Butyral

The manufacture of polyvinyl butyral began in 1938. The major raw materials used in the polyvinyl butyral process are as follows: vinyl acetate, benzene (eliminated around 1950), ethyl alcohol, sulfuric acid, butyraldehyde.

Polyvinyl Formal

The manufacture of polyvinyl formal began in 1939. The major raw materials used in the process are as follows: vinyl acetate, benzene (eliminated around 1967), acetic acid, sulfuric acid, formalin.

Polyvinyl Acetate

The manufacture of polyvinyl acetate for sale began in 1945. The major raw materials for the polyvinyl acetate products are as follows: vinyl acetate, dibutyl maleate, 2-ethyl hexyl acrylate, methyl methacrylate, glacial acrylic acid, ethyl acrylate, crotonic acid, methyl ethyl ketone (MEK).

Polyvinyl Butyral Dispersion

The manufacture of polyvinyl butyral dispersion began in 1947. The major raw materials used in the dispersion process are as follows: polyvinyl butyral, castor oil, butyl recinoleate, sodium petroleum sulfonates.

Polyvinyl Alcohol

The manufacture of polyvinyl alcohol began in 1956. The major raw materials in the polyvinyl alcohol process are as follows: vinyl acetate, methyl alcohol, sodium hydroxide.

Polyvinyl Acetate Multipolymer Solutions

The manufacture of multipolymer solution types began about 1962. The major raw materials in the process include the following: vinyl acetate, xylene, 2-ethyl hexyl acrylate, n-butanol, methyl acrylate, isopropanol, glacial acrylic acid, toluene, dibutyl maleate, hexane, glycidol methacrylate, ethyl acetate, ethyl acetate, isopropyl acetate, benzene, ethyl alcohol, styrene

Cellulose Acetate

The Springfield Plant began its first commercial cellulose acetate operation in 1932 when it produced cellulose acetate sheeting or safety glass. Within a few years polyvinyl butyral sheeting replaced cellulose acetate in the safety glass market. Cellulose acetate sheeting was produced at the site until the late 1960s. The major raw materials used for the cellulose acetate operation are as follows: cellulose acetate, dimethyl and diethyl phthalate, methanol, acetone

Polyvinyl Butyral Sheet

Around 1938, the Springfield Plant began the manufacture of polyvinyl butyral sheeting for the laminated safety glass market. The major raw materials used in this process are as follows: polyvinyl butyral resin, sodium bicarbonate, plasticizers, pigments

Phenol/Formaldehyde Resins,

The manufacture of phenol/formaldehyde resins began in Springfield in 1940 . The major raw materials in the phenol/formaldehyde process are as follows: phenol, formaldehyde, isopropanol, methanol, xylol, butanol, ethanol

Polystyrene

The manufacture of polystyrene began at the Springfield site in 1946. Major raw materials used in polystyrene processes include: styrene, acrylonitrile, polybutadiene, colorants, pentane

Melamine and Urea Resins

The melamine and urea resins operation at the Springfield Plant began in 1947 and produced a wide variety of melamine-formaldehyde resins. The major raw materials in the process include the following: formaldehyde, melamine, urea, methanol, isopropanol, butanol, isobutanol, naptha, xylol

Formaldehyde

The manufacture of formalin, formaldehyde gas dissolved in water, began in 1948. The major raw material in the formalin process is methanol

Polyvinyl Chloride

The manufacture of polyvinyl chloride began at the Springfield Plant in 1948. The major raw materials used in the polyvinyl chloride process were as follows: vinyl chloride, vinyl acetate, plasticizers, colorants

In addition, New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

1-26, 48-65, 865-1358, 1360-1832, 2378-2909, 2910-2920, 2922-2940, 2941-3766, 3767-4695, 4696-5226, 5227-5741, 5742-5833, 6368-6374, 6395-6398, 6810-6814, 6825, 7929-7930, 8162-9399, 16459-17279, 17290-17740, 17768-18275, 18276-18548, 18549-18813, 19882-20031, 20121-20192, 20201-20232, 20233-20249¹

¹ All zeroes that precede the Bates numbers listed in this document have been dropped. Thus, for example, a document listed here as "1" is actually Bates stamped "0000001".

d. If the nature or size of Respondent's operations changed over time, describe those changes, the dates they occurred, and the nature of the current business at each such location, including but not limited to a brief description of the major products or services Respondent manufactures or provides.

RESPONSE

Everett Plant – Documents attached to this response at Tab 3d evidence operational changes (including the deletion or addition of various products to the plant's manufacturing processes) at the plant over the 60 years the plant was operated by Old Monsanto. However, New Monsanto does not have the expertise or knowledge regarding the nuances of chemical plant operations to provide an explanation regarding the various changes occurring over the years at Everett.

Indian Orchard – Documents identified below evidence operational changes (including the deletion or addition of various products to the plant's manufacturing processes) at the plant over the time period in which the plant was operated by Old Monsanto. However, New Monsanto does not have the expertise or knowledge regarding the nuances of chemical plant operations to provide an explanation regarding the various changes occurring over the years at the Indian Orchard Facility.

New Monsanto has located information that is responsive to this question in documents with the following Bates numbers numbers (each of the Bates numbers has the prefix "IndOrch"):

1-26, 53-56, 20924-20925

e. List the products Respondent manufactured, recycled, recovered, treated, or otherwise processed in these operations.

RESPONSE

Everett Plant – See documents attached to this response at Tab 3e. Based on our review of the attached documents, Everett had numerous production departments over the years. The following is a list of each production department and its primary finished products: Stymers (Base stymers powder, Scripset 910, Stymers, Scripset 808, DMAS, Scripset 500, and RS 7217);

MP&R (Scripset 520, Scripset 540 and salts)

Dequest (Dequest 2000, Dequest 2010, Dequest 2006, Dequest 2044, Dequest 2052, Dequest 2054, Dequest 2060, Dequest 2066, Dequest XK 3136, and 20° be muriatic acid);

Santocel (Santocel product grades and Syton product grades);

Specialty Chemicals Division (ACL 84, CYA (purified CYA – cyanuric acid, muriatic acid (20% BE)));

*Sulfuric Acid/MCL (30% oleum, 98% sulfuric acid, and 93% sulfuric acid);
Monomeric Plasticizers (DOA (dioctyl adipate), Santicizer-97 (di-C₇-C₉ -alkyl adipate),
Santicizer-367 DCHP (dicyclohexyl phthalate), and IBCHP (isobutyl cyclohexyl
phthalate); and
Polymeric Plasticizers (Santicizer 334F, Santicizer 409, Santicizer 411, Santicizer 412,
Santicizer 429, and Santicizer 712TM).*

The documents also show that, historically, the plant produced: sodium carbonate (1930^{2/}), sodium sulfide (1932), Koch acid – dye intermediate (1940), chlorosulfonic acid (1945), ferric sulfate (1945), ammonia, anhydrous and aqueous (1949), glaubers salt sodium sulfide (1950), aluminum chloride (1950), acetic acid (1950), ethyl and butyl acetate (1950), merchor, sodium hypochlorite 12% soln. (1950), nitreo cellulos lacquers (1951), ethyl alcohol (1954), dry ice (CO₂ blocks and liquid)(1954), phenol (1955), nitric acid (1960), maleic acid (1960), melamine formaldehyde resins (1960), Resloom (melamine formaldehyde ester)(1962), Sodium bisulfate (1963), phthalic anhydride (1964), H-acid, dye intermediate (1965), ACL products (dry bleach and swimming pool treatment chemicals) (1966), aluminum sulfate (1970).

Indian Orchard – See response to Question #3c. Documents attached indicate that major products include: Butvar (polyvinyl butyral), Formvar, GMS, Batch Emulsion, Gelva V 1.5 (polyvinyl acetate), Gelvatol (polyvinyl alcohol), Butvar Dispersions, Amnio Resins, Resimene (urea resins and malmine resins), Formalin (formaldehyde solution), Saflex (polyvinyl butyral sheet), Lustrex (Impact Polystyrene and Crystal Polystyrene)

New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

1-26, 48-65, 865-1358, 1360-1832, 2378-2909, 2910-2920, 2922-2940, 2941-3766, 3767-4695, 4696-5226, 5227-5741, 5742-5833, 7898, 16459-17279, 17290-17740, 17768-18275, 18276-18548, 18549-18813, 19882-20031, 20121-20192, 20201-20232, 20233-20249

f. In general terms, list the types of raw materials used in the operations.

RESPONSE

Everett Plant – See documents attached to this response at Tab 3f. Based on those documents, Everett used the following raw materials in its operations:

<i>Stymer Department</i>	<i>Styrene, maleic anhydride, methanol, beta-nitrostyrene in toluene, di-tertiary butyl peroxide, benzoyl peroxide, iso-butyl alcohol, , shortstop (parabenzyl quinine and methyl-iso-butyl ketone), blandol NF mineral oil, 50% caustic soda, anhydrous ammonia, di-acetone alcohol, scripset 520, acetone, and nitrogen</i>
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^{2/} Dates in parentheses refer to last year of production.

<i>Dequest Department</i>	<i>Phosphorus trichloride, anhydrous ammonia, liquid caustic soda 50%, formalin, PCL₃, acetic anhydride, acetic acid, caustic potash 45%, triethanolamine, ethylene diamine, hexamethylene diamine, formaldehyde, dicalite speedplus (diatomaceous earth), hydrogen peroxide, sodium hydroxide, triethanolamine, and diethylene triamine.</i>
<i>Santocel Department</i>	<i>Ethyl alcohol, 41° be sodium silicate, 93% sulfuric acid, 50% caustic soda, anhydrous ammonia, tetraethyl ortho silicate, dowflake calcium chloride, soda bicarbonate, urea, 70% sorbitol, amberlite 120 + 425 ion exchange media, sodium sulfate, and ethylene glycol</i>
<i>CYA Department</i>	<i>Crude CYA, 12-15% sulfuric acid, hot water, and 180 steam</i>
<i>Sulfuric Acid Department</i>	<i>Molten sulfur, air, and vanadium pentoxide catalyst</i>
<i>Monomeric Plasticizers Department</i>	<i>2 ethyl hexanol, adipic acid, toluene sulfonic acid, peracetic acid, 50% caustic soda, 58% light soda ash, dicalite speed plus D.E., ional C.P., silicone antifoam emulsion, C₇₋₉ alcohol, TS acid, defoamer, phthalic anhydride, cyclohexanol, TSA, BHT, sodium hydroxide, and isobutanol.</i>
<i>Polymeric Plasticizer Department</i>	<i>Carbon norit A, attapulugus earth, dicalite speedplus, hystrene, nitrogen, titanium tetrachloride, 1,3 butylene glycol, adipic acid, bisphenol A or Ionol BHT, 2 ethyl hexanol, 1,2 propylene glycol, bisphenol A, stannous oxalate, C_{7,9,11} oxo alcohol, trimellitic anhydride, attapulugus clay, phthalic anhydride, neofat MB, stearic acid, sodium carbonate, hexanol, sodium hydroxide, and carbon nuchor</i>
<i>Maintenance Department</i>	<i>Lacquer thinner 1006, tritnene, mineral spirits, calcium silicate, fiberglass insulating materials.</i>

Indian Orchard – See response to Question #3c. Major raw materials include: acrylic monomers, butyl alcohol, butyraldehyde, ethyl alcohol, diene rubber, formaldehyde, melamine, methyl alcohol, polyvinyl butyral, styrene, sulfuric acid, toluene, and vinyl acetate.

New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

48-65, 865-1358, 1360-1832, 6352-6353, 6368-6374, 6395-6398, 6436-6438, 6442-6448, 6956-6961, 7929-7930, 16032-16041, 16459-17279, 17290-17740, 17768-18275, 18276-18548, 18549-18813, 19882-20031, 20121-20192, 20201-20232, 20233-20249

g. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- i. the types of material used to clean/maintain this equipment/machinery; and
- ii. the monthly or annual quantity of each material used.

RESPONSE

Everett Plant – See documents attached to this response at Tab 3g, indicating that trichloroethane was used by machinists to degrease and clean small metal parts.

Indian Orchard - New Monsanto has not located information responsive to this question.

h. Describe the methods used to clean up spills of liquid or solid material during operations, including but not limited to:

- i. the type of materials spilled in operations;
- ii. the materials used to clean up these spills;
- iii. the methods used to clean up those spills; and
- iv. where the materials used to clean up those spills were disposed of.

RESPONSE

Everett Plant – See documents attached at Tab 3h, including:

- 1984 Chemical Hazards and Safety Procedure Monsanto, Everett, MA;
- August 1, 1983 Hazardous Spill Prevention and Clean Up Plan
- October 19, 197_, Monsanto Chemical Company Internal Memorandum re: Hazardous Spill Prevention and Clean-up Plan. Established the procedure for responding to spills of hazardous substances and states that “any person discovering a spill or serious leak will immediately report this to supervision of the concerned department” and “the concerned department will take immediate action to terminate or confine the spill.” Lists Bill Hayes as day shift contact to assist in implementing best plan to isolate surface drains in the path of the spill and lists I.A. Newcomer, Davis Woo, J. D. Garrison, and M. A. Wade as personnel to be contacted in the case of a major spill or leak. Includes the following methods used to clean up spills: trenching (to divert flow away from a surface drain), damming area around a leak with payloaders or backhoes, portable pumps to pump material to a low area or empty tank truck car for later disposal, treat acid spills on the ground with soda ash, absorb phosphorus trichloride spills with sand or earth, resurface area on which organic materials have spilled with crushed stone or similar materials, scrape up extensive spills of solids with a payloader or bulldozer and dispose of in accordance with the Environmental Specialists’ (I.A. Newcomer’s) recommendation;
- October 1984, Everett Plant Contingency Plan;
- Everett Plant Accident Manual, Attachment 2. Lists the Everett plant product information and related health hazards. It also provides the following brief instructions of how to clean up spills for the following products:

Santocel, Syton, Stymer, Scripset 520, Lytron 810, CYA, and DCHP	Shovel up.
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<i>Sulfuric acid, oleums, and muriatic acid (HCL)</i>	<i>Neutralize with soda ash, wash down with great excess of water</i>
<i>Stymer S, Lytron RS 6709, Scripset 500, Scripset 530, RPC 110, RCP 130</i>	<i>Shovel up, or flush down with copious amounts of water</i>
<i>Silester A-1</i>	<i>Flush spill area with water spray.</i>
<i>Monmeric Plasticizers, DOA, S-97, Polymeric Plasticizers 409, 411, 412, 429, 334, and 79T</i>	<i>Spread sand and sawdust over spill to overcome slippery surface</i>

- *Emergency Procedure for Handling Accidental Spills of Pesticide Chemicals;*
- *Monsanto Emergency Response Information Teams, MERIT Team Equipment Packet;*
- *Monsanto Emergency Response Information Teams, Operating Procedures of Tanks, Safety Relief Devices – guidance for responding to leakers or roll-overs;*
- *Monsanto Emergency Response Information Team Workshop, Drums and Cylinders – Patching and Handling;*
- *Monsanto Industrial Chemicals Company, Near Miss Accident Investigation.*

Indian Orchard – See documents identified below, including:

- *Chronology and Spills, Injuries, Reportables, Near Misses, Fire Reports 1985*
- *Comprehensive Bircham Bend Plant Operations Manual*
- *Division of Hazardous Waste Report 6/3/82*

New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

92-94, 1833-2334, 2378-2909, 6442-6448, 21318-21323, 24420-24430

i. Provide a schematic diagram or flow chart that fully describes and/or illustrates the operations at the Site.

RESPONSE

Everett Plant – See documents attached to this response at Tab 3i.

Indian Orchard - New Monsanto has not located information responsive to this question.

j. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had any contact with Whitney Barrel Company.

RESPONSE

Everett Plant – New Monsanto's investigation identified documents containing employee lists. However, because New Monsanto was not involved in operating the Everett Plant, New Monsanto is not familiar with which employees may or may not have knowledge concerning information sought in EPA's request or this question. However, in an attempt to respond, New Monsanto compiled a list of plant managers, environmental specialists, environmental engineers, technical superintendents and any other employees who, solely by virtue of their title at the Everett plant, may have knowledge regarding the subject matter of this Information Request. The list is included as New Monsanto's response to Question #5c.

Indian Orchard - See response to Question #5c for a list of employees or former employees of the Indian Orchard Facility who may have knowledge regarding the subject matter of the foregoing questions.

4. Respondent's Wastes and Waste Streams (including By-Products)

NOTE: All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated.

a. Complete the enclosed "Waste Survey" checking each substance present in Respondent's wastes or by-products and providing all requested information for each such substance that is checked.

RESPONSE

Everett Plant – See Table S-1, providing a description of the plant's waste. This table includes the waste source, a description of the waste, waste classification, volume of waste per year, disposal container (type and size), and final disposition. Table S-1 is attached at Tab 4a.

Indian Orchard – See response to Question #3c. New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

27-42, 43-418, 419-612, 613-864, 3767-5833, 6052-6061, 6063-6116, 6119, 6125-6129, 6161, 6164-6178, 6179-6180, 6224-6274, 6375-6380, 6810-6814, 6825, 6851-6855, 6861-6892, 6899-6949, 6956-6961, 6978-7036, 7047-7048, 7050-7068, 7076-7083, 7096, 7098, 7128-7298, 7318-7320, 7686, 7689, 7709-7737, 7786-7808, 7932-9399, 9422, 9469-9484, 9502-9520, 9560-9566, 9576-9578, 9579-9600, 9662-9850, 9958-10001, 10165-10208, 10265-10332, 10388-10558, 10601-10625, 10641-10816, 10868-10917, 10918-10932, 10972-11518, 11520-11620, 11730-11744, 11840-12224, 12227-12236, 12238-12257, 12268-12308, 12386-12838, 13816-13938, 14686, 14750-52, 14842-14857, 14858-14969, 14976-15045, 15127-15160, 15534-15683, 15692-15697, 15786-15887, 15942-16032, 16042-16331, 16347-16403, 16453-16458, 16459-17279, 17290-17740, 17768-18813, 19565-20192, 20201-20249, 20250-20280, 20281-20350,

20351-20715, 20716-20799, 21406-21692, 21693-21960, 21961-22300, 22301-22601, 22602-22772, 22837-22876, 22950-22951, 22963, 22973-23051, 23096-23112, 23118-23138, 23182-23212, 23313-23346, 23350-23408, 23428-23485, 23486-23539, 23611-23659, 23720-23775, 24003-24426, 24428-24455, 24465-24578, 24846-24845, 24959-25144, 25193-25252, 25330-25439, 25440-25598, 25599-25811, 25816-26190, 26191-26496

b. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- i. its physical state;
- ii. its name and chemical composition;
- iii. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- iv. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

RESPONSE

Everett Plant – See attached Table S-1 and documents attached to this response at Tab 4b.

Indian Orchard – See response to Question #3c. New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

27-42, 43-418, 419-612, 613-864, 3767-5833, 6052-6061, 6063-6116, 6119, 6125-6129, 6161, 6164-6178, 6179-6180, 6224-6274, 6375-6380, 6810-6814, 6825, 6851-6855, 6861-6892, 6899-6949, 6956-6961, 6978-7036, 7047-7048, 7050-7068, 7076-7083, 7096, 7098, 7128-7298, 7318-7320, 7686, 7689, 7709-7737, 7786-7808, 7932-9399, 9422, 9469-9484, 9502-9520, 9560-9566, 9576-9578, 9579-9600, 9662-9850, 9958-10001, 10165-10208, 10265-10332, 10388-10558, 10601-10625, 10641-10816, 10868-10917, 10918-10932, 10972-11518, 11520-11620, 11730-11744, 11840-12224, 12227-12236, 12238-12257, 12268-12308, 12386-12838, 13816-13938, 14686, 14750-52, 14842-14857, 14858-14969, 14976-15045, 15127-15160, 15534-15683, 15692-15697, 15786-15887, 15942-16032, 16042-16331, 16347-16403, 16453-16458, 16459-17279, 17290-17740, 17768-18813, 19565-20192, 20201-20249, 20250-20280, 20281-20350, 20351-20715, 20716-20799, 21406-21692, 21693-21960, 21961-22300, 22301-22601, 22602-22772, 22837-22876, 22950-22951, 22963, 22973-23051, 23096-23112, 23118-23138, 23182-23213, 23313-23346, 23350-23408, 23428-23485, 23486-23539, 23611-23659, 23720-23775, 24003-24426, 24428-24455, 24465-24578, 24846-24845, 24959-25144, 25193-25252, 25330-25439, 25440-25598, 25599-25811, 25816-26190, 26191-26496

c. Describe how each type of waste was collected and stored at Respondent's operation prior to disposal/recycling/sale/transport, including:

- i. the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);
- ii. the colors of the containers;
- iii. any distinctive stripes or other markings on those containers;
- iv. any labels or writing on those containers (including the content of those labels);
- v. whether those containers were new or used;
- vi. where each type of waste was collected/stored; and
- vii. if those containers were used, a description of the prior use of the containers.

RESPONSE

Everett Plant – See attached Table S-1 and documents attached at Tab 4c.

Per an intra-company labeling bulletin (included with documents at tab 4c), Monsanto required facilities to affix a Monsanto company logo to all 15, 30, and 55-gallon drums. The 7 ½" x 19" logo and full size code symbols were attached to drums and centered below the 2-inch bung. Monsanto label placement was always close to the upper rolling hoop on 55-gallon drums and between rolling hoops on 15- and 30-gallon drums.

The attached documents also indicate the following: Dequest liquid wastes (unrecovered acetic acid and unrecovered HCL, and H₃PO₃) were collected in a scrub water system and sent to a limestone neutralization facility. After neutralization, these liquids were discharged to the MDC sewer system under the plant's industrial user discharge permit. By-product muriatic acid was either sold as a useful product or neutralized and sewered. Gaseous wastes (non-condensable purge gases from the process train and miscellaneous storage tank vent gases) were pulled through water scrubbers to remove residual acetic acid and HCL and then released into the atmosphere. Solid waste (primarily filter cake from the product filter and spent limestone sludge) was collected onsite in a dumpster (filter cakes) or stockpiled on site and allowed to drain (limestone sludge) and then hauled away to a landfill for ultimate disposal.

Process waste from the cyanuric acid plant was received, stored and fed to a crystallizer or reactor where it was mixed with 10% lime slurry at pH 10 and 50° C to produce a precipitate of calcium sulfate dihydrate (gypsum). The crystallizer or reactor overflowed to one of two settling ponds where the gypsum settled out and the clear supernatant free of 95% of its sulfate content flowed to the MDC sewer system. Periodically, each settling pond was emptied of its gypsum burden with a scoop shovel. The gypsum was ultimately trucked away to a dump.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

27-42, 43-418, 419-864, 1579-9600, 9851-9902, 11875-11883, 12049-12065, 12098-12138, 12161-12224, 12227-12236, 12238-12257, 12268-12308, 14452-14685, 14687-14749, 14753-14773, 14776-14779, 14858-14954, 14976-15045, 15888-15889, 16434-16443, 17201-17279, 17290-17740, 17768-18813, 19565-20192, 23214-23226, 23347-23349, 23525-23539, 23611-23659, 24456-24464

d. Identify (see Definitions) the person(s) who was responsible for collecting and managing each type of waste.

RESPONSE

Everett Plant – See response to Question #5c for employees who may have been responsible for managing waste at the Everett Plant.

Indian Orchard - See response to Question #5c for a list of employees or former employees who may have been responsible for managing waste at the Indian Orchard Facility.

e. For each location, identify and provide copies of all surveys or studies conducted between 1950 and 1985 about its waste management practices including but not limited to disposal, treatment, storage, recycling, or sale of wastes.

RESPONSE

Everett Plant – New Monsanto located the following surveys responsive to this question: The Eckhart Survey, completed in 1978, 1982 EPA Small Generator Questionnaire, and 1982, 1983 and 1984 CMA Hazardous Waste Surveys. The surveys are attached at Tab 4e.

Indian Orchard - See documents identified below, including:

- History of On Site Waste Disposal Operation at Monsanto Company - Springfield and Bircham Bend Plants 1938-1972
- Hazardous Waste Annual Reports, 1981-1985
- Bircham Bend Waste Disposal Site Survey (6/79)
- Division of Hazardous Waste Report 6/3/82

New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

48-65, 613-864, 7299-7302, 7321-7442, 7516-7536, 7766-7843, 11730-11874, 11875-12308, 12902-12951, 13198-13713, 15786-16458, 16459-17279, 17290-17740, 17768-18813, 18814-19231, 19235-19558, 20870-20928, 20929

f. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had contact with Whitney Barrel Company.

RESPONSE

Everett Plant – New Monsanto's investigation identified documents containing employee lists. However, because New Monsanto was not involved in operating the Everett Plant, New Monsanto is not familiar with which employees may or may not have knowledge concerning information sought in EPA's request or this question. However, in an attempt to respond, New Monsanto compiled a list of plant managers, environmental specialists, environmental engineers, technical superintendents and any other employees who, solely by virtue of their title at the Everett plant, may have knowledge regarding the subject matter of this Information Request. The list is included as New Monsanto's response to Question #5c.

Indian Orchard - See response to Question #5c for a list of employees or former employees of the Indian Orchard Facility who may have knowledge regarding the subject matter of the foregoing questions.

5. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By-Products):

NOTE: All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated.

ALSO NOTE: Your response to questions in this section must refer to all locations to which Respondent sent its wastes.

a. Identify (see Definitions) all individuals who currently have and those who have had responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

RESPONSE

Everett Plant – New Monsanto's investigation identified documents containing employee lists. However, because New Monsanto was not involved in operating the Everett Plant, New Monsanto is not familiar with which employees may or may not have knowledge concerning information sought in EPA's request or this question. However, in an attempt to respond, New Monsanto compiled a list of plant managers, environmental specialists, environmental engineers, technical superintendents and any other employees who, solely by virtue of their title at the Everett plant, may have knowledge regarding the subject matter of this Information Request. The list is included as New Monsanto's response to Question #5c.

Indian Orchard - See response to Question #5c for a list of employees or former employees who may have had responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

b. Identify (see Definitions) all individuals who currently have and those who have had knowledge of the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

RESPONSE

Everett Plant – New Monsanto's investigation identified documents containing employee lists. However, because New Monsanto was not involved in operating the Everett Plant, New Monsanto is not familiar with which employees may or may not have knowledge concerning information sought in EPA's request or this question. However, in an attempt to respond, New Monsanto compiled a list of plant managers, environmental specialists, environmental engineers, technical superintendents and any other employees who, solely by virtue of their title at the Everett plant, may have knowledge regarding the subject matter of this Information Request. The list is included as New Monsanto's response to Question #5c.

Indian Orchard - See response to Question #5c for a list of employees or former employees of the Indian Orchard Facility who may have knowledge regarding the subject matter of this Information Request.

c. Identify (see Definitions) all individuals who currently have and those who have had responsibility for Respondent's environmental matters.

RESPONSE

The lists of employees identified below for the Everett and Indian Orchard facilities have been gleaned from the documents found at the respective facilities. It is likely that other persons not identified below may also have had responsibility for environmental matters at the facilities. See also documents attached at Tab 5c.

Everett Plant –
George N. Fisher, Plant Manager (1968-1969)
William L. Merman, Plant Manager (1972-1974)
Robert E. Cummings, Plant Manager (1979-1981)
Robert Marsh, Plant Manager
Fred Thompson, Plant Manager (1984)
John Dushney, Plant Manager (1984-1985^{3/})
James F. Murphy, Plant Manager (1985)

^{3/} Dates in parentheses may not represent complete dates of employment. Dates were collected from documents (correspondence, reports, memorandum, etc...) that included the employee's name.

Irving A. Newcomer, *Environmental Specialist (1943-1983)*
 Jerry N. McGuire, *Manager – Environmental Protection/Hazardous Waste (1981)*
 Jeff H. Waldbeser, *Manager – Environmental Protection/Industrial Hygiene (1981)*
 Jeffrey I. Doyle, *Environmental Engineer (1984-1985)*
 Henry W. Nowick, *Environmental Control Specialist (1988)*
 Lester J. Gilbert, *Technical Superintendent (1971-1975)*
 C.P. Cunningham, *Managing Director (1971-1975)*
 T.K. Smith, Jr. *Group Vice President (1971)*
 Davis Woo, *Engineering Specialist (1970-1983)*
 Thomas N. Nealon, *Environmental Services (1974)*
 Nancy Gheen, *Personnel Superintendent (1984-1985)*
 Gerard A. Osborne, *Safety Superintendent (1984-1985)*
 Timothy P. Hanley, *Engineering Superintendent (1984-1985)*
 Harvey W. Berry, *Maintenance Superintendent (1984-1985)*
 K. Kwong, *TSD Contact (1983)*
 A. Johnson, *TSD Contact (1983)*
 Jack D. Garrison, *Emergency Action Team Supervisor (1983), Manufacturing Superintendent (1984-1985)*
 M.A. Wade, *Emergency Action Team Supervisor (1983)*
 L.S. Allen, *Emergency Action Team Supervisor (1983)*
 P.F. Aquan, *Emergency Action Team Supervisor (1983)*
 T.M. Dayton, *Emergency Action Team Supervisor (1983)*
 J.J. McDrury, *Emergency Action Team Supervisor (1983)*

Indian Orchard -

Robert Brazas, *Contract Specialist*
 James Gagnon, *Environmental Specialist; Sr. Environmental Engineer*
 L.S. Gormally, *Purchasing and Materials Handling Superintendent*
 William Killian, *Materials Handling Supervisor*
 George Lemos, *Energy/Environmental Operations Superintendent*
 Karl Mahaffey, *Plant Engineer*
 John Mumper, *Scheduling and Services Supervisor*
 Kenneth Neeld, *Process Engineering Department*
 Henry Nowick, *Environmental Control Specialist*
 Isaac Wilbur, *Engineering/Environmental Superintendent; Sr. Manufacturing Specialist*

d. For the previous three responses, also provide each individual's:

- i. job title;
- ii. duties;
- iii. dates performing those duties;
- iv. supervisors for those duties;
- v. current position or, if such individual is no longer employed by Respondent, the date of the individual's resignation; and
- vi. the nature of the information possessed by such individuals concerning Respondent's waste management.

RESPONSE

Everett Plant – See response to Question #5c.

Indian Orchard - See response to Question #5c.

- e. Describe the containers used to take each type of waste from Respondent's operation, including but not limited to:
- i. the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);
 - ii. the colors of the containers;
 - iii. any distinctive stripes or other markings on those containers;
 - iv. any labels or writing on those containers (including the content of those labels);
 - v. whether those containers were new or used; and
 - vi. if those containers were used, a description of the prior use of the containers.

RESPONSE

Everett Plant – See Table S-1, attached at Tab 4a. Based on the documents, Scripset waste was stored in 20 to 30 gallon fiber drums and then transferred to a 30 cu. yd. disposal container. Control laboratory waste was stored in 55 gallon drums. Monomeric plasticizer waste was stored in 13 cu. yd. disposal containers. Polymeric plasticizer waste was stored in 3 cu. yd. boxes and then transferred to 13 cu. yd. disposal containers. Plant and office waste was stored in a 13 cu. Yd. container. Asbestos insulation waste was stored in 61 gallon fiber drums and other various size fiber drums. Chemical plant waste was stored in 55 gallon steel drums. CYA waste was stored in 61 gallon fiber drums. Asbestos insulation waste from the powerhouse demolition was stored in plastic bags in a bulk truck. Oil sludge and PCBs were stored in bulk tank trucks. Some PCB contaminated therminol was stored in 55 gallon drums within the curbed PCB storage area.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

43-418, 613-864, 1360-1832, 2910-2920, 2922-2940, 2941-3766, 3767-4695, 4696-5226, 5227-5741, 5742-5833, 6224-6274, 6375-6380, 6810-6814, 7047-7048, 7108-7111, 7306-7317, 8162-9899, 9958-10001, 10388-10417, 10522-10558, 10559-10600, 10626-10640, 10641-10670, 10671-10716, 10717-10757, 10758-10796, 10797-10816, 10868-10917, 10972-10996, 10997-11301, 11519, 11588-11616, 11617-11620, 13939-14283, 14907-14915, 14963-14969, 14974-14975, 14976-15030, 15816-15887, 16195-16279, 16434-16443, 16448-16452, 16459-17740, 17768-18813, 18814-18833, 18834-18960, 18961-19054, 19055-19073, 19074-19106, 19107-19170, 19171-19231, 19235-19261, 19262-19347, 19348-19528, 19529-19533, 19535-19548, 19549-19558, 19565-20192,

20201-20249, 20281-20350, 20853, 21406-21692, 24003-24099, 24100-24150, 24151-24200, 24579-24650, 24820, 24651-24787, 25373-25439, 25816-26190, 26191-26496

f. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

RESPONSE

Everett Plant – See response to Question #5h.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

2910-2920, 2922-2940, 2941-3766, 3767-4695, 4696-5226, 5227-5741, 5742-5833, . 6052-6061, 6063-6070, 6075-6080, 6082-6092, 6094-6098, 6100-6108, 6110-6116, 6118, 6119, 6120, 6125-6129, 6131, 6162-6163, 6164-6178, 6817-6819, 6851-6855, 6861-6892, 6894-6895, 6899-6949, 7045-7046, 9441-9448, 9601-9661, 9662-9699, 9700-9750, 9751-9800, 9851-9902, 9903-9957, 10363-10387, 10418-10445, 10717-10757, 10935-10971, 16459-17740, 17768-18813, 18814-18833, 18834-18960, 18961-19054, 19055-19073, 19074-19106, 19107-19170, 19171-19231, 19235-19261, 19262-19347, 19348-19528, 19529-19533, 19535-19548, 19549-19558, 19565-20192, 20201-20249

g. Provide copies of such contracts and other documents reflecting such agreements or arrangements.

RESPONSE

Everett Plant – See documents attached at Tab 5g.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

2910-2920, 2922-2940, 2941-3766, 3767-4695, 4696-5226, 5227-5741, 5742-5833, 6052-6061, 6062, 6075-6080, 6082-6092, 6094-6098, 6100-6108, 6110-6116, 6118, 6120, 6131, 6162-6163, 6164-6178, 6817-6819, 6851-6855, 6861-6892, 6894-6895, 6899-6949, 7072, 7103-7105, 7112-7113, 7121, 9441-9448, 9579-9600, 9601-9661, 9662-9699, 9851-9902, 10051-10113, 10335-10362, 10363-10387, 10418-10445, 10717-10757, 10997-11301, 11305-11518, 11520-11587, 12386-12838, 12952-13197, 13714-13756, 13939-14283, 16459-17740, 17768-18813, 18814-18833, 18834-18960, 18961-19054, 19055-19073, 19074-19106, 19107-19170, 19171-19231, 19235-19261, 19262-19347, 19348-19528, 19529-19533, 19348-19528, 19529-19533, 19535-19548, 19549-19558, , 19565-20192, 20201-20249, 20716-20799, 20800-20830, 20853, 22774-22836, 22907-22914, 23092-23095, 23113-23117, 23182-23205, 24100-24150, 24151-24200, 24201-24264, 24362-24379, 24846-24958, 24959-25014, 25253-25329, 25477-25598

h. State where Respondent sent each type of its waste, including barrels and empty barrels, for disposal, treatment, or recycling.

RESPONSE

Everett Plant – See documents attached at Tab 5h, indicating the following:

Nonhazardous solid waste, primarily from the Scripset Department, was transported by Charles Lee Disposal Company and disposed of by incineration at De Matteo Dump Site, operated by RESCO Company, in Saugus, MA. Some nonhazardous waste was also incinerated at East Bridgewater in Bridgewater, MA. The remainder of the plant's nonhazardous solid waste, including monomeric and polymeric plasticizer waste and general trash and office waste, was landfilled at a state-approved sanitary landfill operated by Browning Ferris Industries ("BFI"), in Randolph, MA. BFI also transported the wastes to its landfill. Some monomeric and polymeric plasticizer waste was also discharged to the MDC sewer.

Hazardous solid waste (including filter cake from plasticizers operation and partially reacted styrene monomer and maleic anhydride) was disposed of in three hazardous waste landfills: Model City, New York and Bordentown, New Jersey, operated by SCA Chemical Waste Services, and Niagara Falls, New York, operated by CECOS International. Hazardous liquid waste was disposed of in hazardous waste incinerators in Bridgeport, New Jersey and Deer Park, Texas, operated by Rollins. Transportation of these hazardous wastes was provided by the disposers.

Nonroutine hazardous solid waste generated as the result of spills of designated RCRA hazardous materials was manifested and disposed of at approved hazardous waste disposal facilities on a case-by-case basis. Some nonhazardous waste was sent to Chem-Met Services in Wyandotte, Michigan. PCB contaminated thermol, rags, and other cleaning materials were disposed of by Rollins Environmental.

Asbestos insulation wastes were landfilled at J.F. Partyka & Sons Landfill in Chicapee, MA and Landfill and Development Corporation in Mt. Holly, New Jersey.

Oil sludge from fuel oil tank residues was incinerated at Jet-Line Services, Inc. in Stoughton, MA and/or sent to Beede Waste Oil Corporation in Plaistow, NH for oil recovery. Hazardous waste liquid and waste oil was also sent to Narragansett Improvement Company in Providence, Rhode Island. Some waste formaldehyde was sent to Ross Incineration Services in Dayton, Ohio.

Non-contact cooling water was discharged to the Mystic River.

Historically (up through 1976), the plant disposed of plant waste on site, including organic and inorganic sludges, solids, and liquids. More specifically, the plant disposed of calcium sulfate waste from acetic process in its acetic residue disposal site, aluminum

sulfate mud and other solids in its Alum Mud and Alum Mud Pond disposal site, coal tar residue, and phthalic anhydride in its A-9 Mud disposal site, calcium sulfate slurry in its H-Acid Mud disposal site, CYA filter residue in its CYA Residue disposal site, B-9 mud, maleic acid, phthalic acid, naphthalene tars in its Plant Dump, stormwater runoff from monomers and polymers in its Plastics Containment Lagoon, and sulfur, pyrite cinders, iron oxides, and salt in its Unloading Dock raw material piles. In addition, waste material from the plasticizer operations was removed by Eastern Equipment Company and burned on a barge in the Boston Harbor.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

43-418, 618-864, 2910-2920, 2922-2940, 2941-3766, 3767-4695, 4696-5226, 5227-5741, 5742-5833, 6052-6061, 6063-6070, 6075-6080, 6082-6092, 6094-6098, 6100-6108, 6110-6116, 6119, 6164-6178, 6179-6180, 6851-6855, 6861-6892, 6899-6949, 16459-17740, 17768-18813, 18814-18833, 18834-18960, 18961-19054, 19055-19073, 19074-19106, 19107-19170, 19171-19231, 19235-19261, 19262-19347, 19348-19528, 19529-19533, 19535-19548, 19549-19558, 19565-20192, 20201-20249, 21324-21405, 21406-21692, 21693-21960, 21961-22300, 22301-22601, 22602-22772, 25816-26190, 26191-26496

i. Identify (see Definitions) all entities and individuals who picked up waste, including barrels, from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request).

RESPONSE

Everett Plant – Waste haulers include:

Browning Ferris Industries, Inc.	Inland Pollution Control
Sanata-James A. Freany, Inc.	Chemical Recovery, inc.
Charles Lee Disposal, Inc.	SCA Chemical Services
Boston Disposal Company	Marlyn Engineering Corp.
Eastern Equipment Company	Tonawanda Tank Lines
General Chemical Company	Clean Harbor, Inc.
Jet-Line Services, Inc.	Suffolk Services, Inc.
Rollins Environmental Services	Clean Industry, Inc.
CECOS International	R.S. Liquid Waste Disposal
Transformer Service, Inc.	S-J Transportation Co.
North East Solvent Reclamation Co.	Chemical Waste Management, Inc.

Indian Orchard – The annual waste surveys filled out by plant personnel provide a listing of some of the waste firms or contractors used by the Indian Orchard Facility.

Specifically, documents with Bates numbers 42 and 11802 provide the following information:

<i>Name of Waste Firm or Contractor</i>	<i>Address</i>	<i>Years Used</i>
<i>Ahearn Trucking Co., Inc.</i>	<i>845 Burnett Road Chicopee, MA 01020</i>	<i>1968 - 1979</i>
<i>GB International, Inc.</i>	<i>P.O.Box 109 174 South Boulevard West Springfield, MA 01089</i>	<i>1973 - 1975</i>
<i>Pollution Abatement Serv.</i>	<i>P.O. Box 4065 East Seneca Street Oswego, NY 13126</i>	<i>1973 - 1976</i>
<i>Cannons Engineering Corp.</i>	<i>First Street Bridgewater, MA 02324</i>	<i>1976 - 1978</i>
<i>Recycling Industries Inc.</i>	<i>385 Quincy Avenue Braintree, MA 02184</i>	<i>1976 - 1979</i>
<i>Rollins Environmental</i>	<i>Serv.Route 295 Bridgeport, NJ</i>	<i>1973 - 1974</i>
<i>Sweeney Bros. Trucking</i>	<i>280 New Ludlow Road Chicopee, MA</i>	<i>1973</i>
<i>Rollins Enviromental Serv.</i>	<i>P.O.Box 349 Wilmington, Delaware</i>	<i>1973 - 1974</i>
<i>P. B. Mutrie</i>	<i>Waltham, MA</i>	<i>1968 - 1979</i>
<i>Chemical Leaman Tank Lines</i>	<i>Downingtown, PA</i>	<i>1973</i>
<i>Matlack Inc.</i>	<i>Landstowne, PA</i>	<i>1972 - 1974</i>
<i>Taylor Pumping Co.</i>	<i>P.O. Box 115, RD #3 BelleMeade, NJ</i>	<i>1978</i>
<i>Reliable Industrial Waste Disposal</i>	<i>100 Railroad Rd. Beacon Falls, CM</i>	<i>1973</i>
<i>Chem-Trol Pollution Services, Inc</i>	<i>1135 Balmer Rd Model City, NY 14107</i>	<i>1978-1979</i>
<i>Chem-Trol Pollution Services, Inc</i>	<i>Wilsonville, IL</i>	<i>1978</i>
<i>M.T. Sullivan Co.</i>	<i>New Ludlow Rd. Granby, MA 01033</i>	<i>? - 1975</i>

In addition, New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

27-42, 43-418, 613-864, 2910-2920, 2922-2940, 2941-3766, 3767-4695, 4696-5226, 5227-5741, 5742-5833, 5873-5880, 6051, 6052-6061, 6063-6070, 6075-6080, 6082-6092, 6094-6098, 6100-6108, 6110-6116, 6119, 6120, 6131, 6157, 6161, 6162-6163, 6164-6178, 6179-6180, 6816, 6817-6819, 6851-6855, 6861-6892, 6899-6949, 6956-6961, 6978-7036, 7045-7046, 7050-7068, 7076-7079, 7080-7083, 7087, 7103-7105, 7112-7113, 7143, 7450-7461, 7525-7526, 7529-7535, 7589, 7687-7688, 7778-7785, 7818-7824, 7844-7888, 7902-7925, 7927-7928, 7932-8161, 9463, 9469-9478, 9502-9520, 9579-9600, 9601-9661, 9662-9699, 9700-9750, 9801-9850, 9851-9902, 9958-10001, 10051-10113, 10114-10130, 10165-10208, 10209-10264, 10265-10304, 10305-10332, 10363-10387, 10388-10417, 10418-10445, 10446-10521, 10522-10588, 10559-10600, 10601-10625, 10626-10640, 10641-10670, 10617-10716, 10717-10757, 10817-10867, 10997-11301, 11305-11518, 11520-11587, 11621-11729, 11730-11744, 11745-11803, 11840-11874, 12066-12097, 12139-12160, 12386-12838, 12839-12901, 12952-13197, 13714-13756, 13791-13808, 13816-13938, 13939-14283, 14842-14857, 15816-15887, 15128-15136, 15890-15941, 16459-17740, 17768-18813, 18814-18833, 18834-18960, 18961-19054, 19055-19073, 19074-19106, 19107-19170, 19171-19231, 19235-19261, 19262-19347, 19348-19528, 19529-19533, 19535-19548, 19549-19558, 19565-20192, 20193-20198, 20201-20249, 20281-20350, 20351-20715, 20716-20799, 20853, 21018-21200, 21201-21317, 21324-21405, 21406-21692, 21693-21960, 21961-22300, 22300-22601, 22602-22772, 22774-22836, 22877-22906, 22907-22914, 22927-22949, 22952-22962, 22964-22972, 23052-23091, 23118-23138, 23139-23170, 23171-23179, 23206-23213, 23227-23233, 23234-23248, 23313-23346, 23409-23427, 23449-23485, 23486-23524, 23540-23610, 23611-23659, 23720-23775, 23776-24002, 24003-24099, 24100-24150, 24151-24200, 24201-24264, 24265-24361, 24362-24379, 24380-24426, 24428-24455, 24465-24578, 24579-24820, 24651-24787, 24788-24845, 24845-24846, 24959-25014, 25015-25103, 25104-25144, 25145-25192, 25193-25252, 25373-25439, 25440-25476, 25477-25598, 25599-25811, 25812-22815, 25816-26190, 26191-26496

j. If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to "Waste Carriers" with reference to Respondent's actions.

RESPONSE

Everett Plant – See response to Question #5h.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

27-42, 2910-2920, 2922-2940, 2941-3766, 3767-4695, 4696-5226, 5227-5741, 5742-5833, 6071-6074, 6081, 6093, 6099, 6109

k. For each type of waste specify which Waste Carrier picked it up.

RESPONSE

Everett Plant – See response to Question #5h.

Indian Orchard – The annual waste surveys filled out by plant personnel provide a listing of the wastes that the waste carriers disposed of for the Indian Orchard Facility. Specifically, documents with Bates numbers 31, 33, 35, 37, 39, 11793, 11797, 11799, and 11801 provide the following information:

Ahearn Trucking Co, Inc.

Heavy metals & trace metals (bonded organically & inorganically): arsenic, selenium, antimony, mercury, iron, manganese, magnesium, zinc, cadmium, copper, chromium (trivalent), chromium (hexavalent), lead;

Organics: halogenated aliphatics, halogenated aromatics, acrylates & latex emulsions, PCB/PBB's, amides, amines, imides, plastizers, resins, elastomers, solvents polar (except water), carbontetrachloride, trichloroethylene, other solvents nonpolar, solvents, halogenated aliphatic, solvents halogenated aromatic, oils and oil sludges, esters and ethers, alcohols, ketones & aldehydes;

Inorganics: salts, mercaptans, paints & pigments, asbestos.

Cannons Engineering Corp.

amides, amines, imides, plastizers, resins, solvents, polar (except water), other solvents nonpolar, oils and oil sludges, esters and ethers, alcohols, ketones, and aldehydes

Recycling Industries Inc.

Acid solutions, with $\text{PH} < 3$; Base solutions, with $\text{PH} > 12$

Pollution Abatement Services

Acid solutions, with $\text{pH} < 3$; Base solutions, with $\text{pH} > 12$; halogenated aliphatics, halogenated aromatics, amides, amines, imides, plastizers, resins, elastomers, solvents polar (except water), other solvents nonpolar, solvents halogenated aliphatic, solvents halogenated aromatic, esters and ethers, alcohols, ketones & aldehydes, dioxins

Inorganics: salts, mercaptans

Rollins Environmental Services

Organics: alcohols

Reliable Industrial Waste Disposal

Organics: solvents polar (except water), esters and ethers

Chem Trol Pollution Services - Model City

Organics: acrylates & latex emulsions, resins, solvents polar (except water), other solvents nonpolar

ChemTrol Pollution Services Inc. - Wilsonville

Organics: acrylates & latex emulsions, resins, solvents polar (except water), other solvents nonpolar

M.T. Sullivan Co.

Acid solutions, with pH<3; organic acid manufacture

Organics: acrylates & latex emulsions, resins, solvents polar (except water), esters and ethers, alcohols,

In addition, New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

27-42, 43-418, 613-864, 2910-2920, 2922-2940, 2941-3766, 3767-4695, 4696-5226, 5227-5741, 5742-5833, 6052-6061, 6063-6070, 6075-6080, 6082-6092, 6094-6098, 6100-6108, 6110-6116, 6119, 6164-6178, 6851-6855, 6861-6892, 6894-6895, 6899-6949, 6978-7036, 7047-7048, 7143-7298, 7686, 7710-7732, 7734-7737, 7844-7888, 7902-7925, 7932-8161, 9502-9520, 9700-9750, 9851-9902, 10165-10208, 10209-10264, 10265-10304, 10305-10332, 10446-10521, 10817-10867, 10997-11301, 11730-11744, 12066-12097, 12139-12160, 16459-17740, 17768-18813, 17741-17767, 18814-18833, 18834-18960, 18961-19054, 19055-19073, 19074-19106, 19107-19170, 19171-19231, 19235-19261, 19262-19347, 19348-19528, 19529-19533, 19535-19548, 19549-19558, 19565-20192, 20201-20249, 21324-21405, 21406-21692, 21693-21960, 21961-22300, 22301-22772, 24003-24099, 24265-24361, 24380-24426, 24428-24455, 24465-24578, 24959-25014, 25145-25192, 25330-25372, 25599-25811, 25816-26496

1. For each type of waste, state how frequently each Waste Carrier picked up such waste.

RESPONSE

Everett Plant – New Monsanto did not locate information responsive to this question.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

2910-2920, 2922-2940, 2941-3766, 3767-4695, 4696-5226, 5227-5741, 5742-5833, 6051, 6062, 6894-6895, 7143-7298, 7710-7732, 7734-7737, 7844-7888, 7902-7925, 7932-8161, 8162-9399, 9502-9520, 9662-9699, 10131-10151, 10152-10164, 10165-10208, 10209-10264, 10265-10304, 10305-10332, 10446-10521, 10817-10867, 10997-11301, 11305-11518, 11520-11587

m. For each type of waste state the volume picked up by each Waste Carrier (per week, month, or year).

RESPONSE

Everett Plant – See Table S-1, attached at Tab 4a.

Indian Orchard – The final draft of the 1991 RCRA Facility Assessment provides a summary of the volume of hazardous waste that waste carriers removed from the Indian Orchard Facility. Specifically, documents with Bates numbers 72-74 provide as follows:

Ross Incineration Services, Inc.

364.1 tons of waste resin solution RQ (toluene)
151.2 tons of waste resin solution
14.5 tons of waste flammable liquid N.O.S.
1.3 tons of waste flammable, corrosive liquid N.O.S.

Chemical Waste Management, Inc., Emelle facility

376.8 tons waste flammable liquid N.O.S.
2.8 tons waste flammable liquid
6.2 tons waste resin solution, and
31.4 waste flammable solids.

Norlite Corporation

110.5 tons of waste resin solution
77.5 tons waste resins solution RQ (toluene)
19.9 tons waste resin solution RQ (styrene monomer inhibited)
8.5 tons waste resin solution RQ (xylene), and
5.0 tons waste flammable liquid.

Transformer Service (Ohio) Inc.

500 gallons waste PCBs
65 pounds waste PCB debris, and
320 pounds empty drums contaminated with PCBs.

SCA Chemical Services (MA) Inc.

3,110 gallons waste flammable liquid N.O.S.
495 gallons waste corrosive liquid N.O.S.
waste corrosive liquid
55 gallons waste flammable liquid, poisonous N.O.S.
20 gallons of waste toluene sulfonic acid liquid
55 gallons of waste corrosive solid, N.O.S. (toluene sulfonic acid),
20 gallons of waste corrosive liquid
110 gallons of hazardous waste solid, N.O.S. (lab chemicals)
30 gallons of waste resin solution
65 gallons waste allyl alcohol
55 gallons of waste alkaline liquid, N.O.S.
80 gallons of waste potassium hydroxide solution
385 gallons of hazardous waste solid
605 gallons waste petroleum oil, N.O.S. |
770 gallons hazardous waste liquid, N.O.S.
275 gallons of waste acrylic acid (17008),
220 gallons of waste ammonium hydroxide
220 gallons of waste hydrochloric acid
55 gallons of waste sodium hydroxide dry beads
330 gallons of waste sodium hydroxide liquid

Clean Harbors

21.3 tons of waste petroleum oil

New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

43-418, 613-864, 2910-2920, 2922-2940, 2941-3766, 3767-4695, 4696-5226, 5227-5741, 5742-5833, 6052-6061, 6063-6070, 6075-6080, 6082-6092, 6094-6098, 6100-6108, 6110-6116, 6119, 6125-6129, 6164-6178, 6851-6855, 6861-6892, 6899-6949, 6978-7036, 7047-7048, 7096, 7098, 7143-7298, 7318-7320, 7686, 7687-7688, 7710-7732, 7734-7737, 7844-7888, 7902-7925, 7927-7928, 7932-8161, 8162-9399, 9479-9484, 9502-9520, 9662-9902, 9958-10332, 10446-10521, 10559-10625, 10671-10716, 10758-10796, 10817-10867, 10918-10932, 10997-11301, 11305-11518, 11520-11587, 11617-11620, 11730-11744, 12066-12097, 12139-12160, 12258-12262, 12839-12901, 13791-13808, 13816-13938, 14686, 14750-14752, 14774-14775, 14842-14857, 14955-14962, 14976-15030, 15692-15697, 16195-16279, 16459-17740, 17768-18813, 17741-17767, 18814-18833, 18834-18960, 18961-19054, 19055-19073, 19074-19106, 19107-19170, 19171-19231, 19235-19261, 19262-19347, 19348-19528, 19529-19533, 19535-19548, 19549-19558, 19565-20192, 20201-20249, 20351-20715, 20716-20799, 21201-21317, 21324-21405, 21406-21692, 21693-21960, 21961-22772, 22950-22951, 22963, 22973-23051, 23092-23095, 23113-23117, 23118-23138, 23182-23205, 23227-23233, 23234-

23248, 23313-23346, 23371-23485, 23720-23775, 24003-24361, 24380-24426, 24428-24455, 24465-24578, 24846-24845, 25145-25192, 25330-25372, 25440-25598, 25599-25811, 25816-26190, 26191-26496

n. For each type of waste state the dates (beginning & ending) such waste was picked up by each Waste Carrier.

RESPONSE

Everett Plant – New Monsanto did not locate information responsive to this question.

Indian Orchard - New Monsanto did not locate information responsive to this question.

o. Provide copies of all documents containing information responsive to the previous seven questions.

RESPONSE

Everett Plant – All documents responsive to this question are attached.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

6051-6129, 6817-6819, 6851-6855, 6861-6892, 6899-6949, 6978-7036, 7047-7048, 7076-7083, 7096, 7098, 7143-7298, 7686-7688, 7710-7732, 7734-7737, 7844-7888, 7902-7925, 7932-8161, 8162-9399, 9479-9484, 9700-9750, 10131-10164, 10209-10332, 10446-10521, 10817-10867, 11305-11518, 11520-11587, 12258-12262, 14686, 14750-14752, 14774-14775, 15128-15136, 16195-16279, 20716-20799, 21201-21317, 21406-21692, 21693-21960, 21961-22300, 22301-22601, 22602-22772, 22950-23051, 23092-23095, 23113-23138, 23182-23205, 23234-23248, 24003-24099, 24265-24361, 24380-24426, 24456-24455, 24465-24578, 25145-25192, 25330-2572, 25477-25598, 25599-25811, 25816-26190, 26191-26496

p. Identify (see Definitions) all of each Waste Carrier's employees who collected Respondent's wastes and waste containers.

RESPONSE

Everett Plant – See documents attached at Tab 5r.

Indian Orchard – Hazardous Waste Manifests often provide the name of the Waste Carrier's employees who collected wastes and waste containers at the Indian Orchard Facility. Manifests with the following Bates numbers identified the following employees:

<i>Bates Number of Document</i>	<i>Employee Identified</i>	<i>Waste Carrier</i>
16462	Larry Smith	Norlite
16665	Lawrence Breedlove	Norlite
16888	Bill Sprague	Clean Harbors
16655	John Haley	Clean Harbors
16695	Antonio Randall	Clean Harbors
16848	Thomas Keene	Clean Harbors
16880	Tom Campoli	Clean Harbors
19587	Edward Harper	SCA Chemical
20038	Michael Landor	Oldover
20058	Carl Alendorf	Oldover
20049	Tom Lovert	Oldover

In addition, New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

6851-6855, 16459-17740, 17768-18813, 19565-20198, 20201-20249

q. Indicate the ultimate disposal/recycling/treatment location for each type of waste.

RESPONSE

Everett Plant – See response to Question #5h.

Indian Orchard – See response to Question #5i. New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

27-42, 43-418, 1360-1832, 2910-3766, 3767-5833, 6052-6061, 6063-6070, 6075-6080, 6082-6092, 6094-6098, 6100-6108, 6110-6116, 6119, 6164-6178, 7045-7046, 12386-12838, 16459-17740, 17768-18813, 17741-17767, 18814-19558, 19565-20192, 20201-20249, 21018-21200, 25477-25598, 25599-25811

r. Provide copies of all documents indicating the ultimate disposal/recycling/treatment location for each type of waste.

RESPONSE

Everett Plant – All documents responsive to this question are attached at Tab 5r.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

27-42, 43-418, 613-864, 2910-3766, 3767-5833, 6052-6061, 6063-6070, 6075-6080, 6082-6092, 6094-6098, 6100-6108, 6110-6116, 6119, 6164-6178, 7093, 7566, 25599-25811

s. Describe how Respondent managed pickups of each waste, including but not limited to:

- i. the method for inventorying each type of waste;
- ii. the method for requesting each type of waste to be picked up;
- iii. the identity of (see Definitions) the waste carrier employee/agent contacted for pickup of each type of waste;
- iv. the amount paid or the rate paid for the pickup of each type of waste;
- v. the identity of (see Definitions) Respondent's employee who paid the bills; and
- vi. the identity of (see Definitions) the individual (name or title) and company to whom Respondent sent the payment for pickup of each type of waste.

RESPONSE

Everett Plant – New Monsanto did not locate information responsive to this question.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

43-418, 613-864, 2910-3766, 3767-5833, 6052-6129, 6164-6178, 6224-6274, 6851-6855, 6861-6892, 6899-6949, 6978-7036, 7050-7068, 7072, 7087, 7103-7105, 7112-7113, 7121, 7128-7132, 7306-7317, 7686, 7687-7688, 7844-7888, 7927-7928, 9479-9484, 9502-9520, 9601-9661, 9700-9800, 10051-10113, 10114-10130, 10152-10387, 10418-10445, 10559-10757, 10918-10932, 12386-12838, 12839-12901, 13791-13808, 14780-14804, 16459-17740, 17768-18813, 18814-19558, 19565-20192, 20351-20715, 20800-20830, 20853, 20201-20249, 22774-22836, 22877-23051, 23052-23095, 23113-23117, 23139-23170, 23227-23233, 23234-23248, 23313-23346, 23409-23427, 23449-23485, 23486-23524, 23540-23610, 24151-24200, 24201-24264, 24362-24379, 24579-24845, 24959-25103, 25145-25192, 25253-25329, 25330-25372, 25440-25598, 25599-25811, 25812-25815, 25816-26190

t. Identify (see Definitions) the individual or organization (i.e., the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.

RESPONSE

Everett Plant – New Monsanto did not locate information responsive to this question.

Indian Orchard - Documents identified below note that Ken Neeld, of the Process Engineering Department, selected which waste carriers would be used by the Indian Orchard facility in the early 1970's.

New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

10933-10934, 11519, 11588, 11617-11620, 20726, 20831-20836, 20863

u. State the basis for and provide any documents supporting the answer to the previous question.

RESPONSE

Everett Plant – N/A

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

10933-10934, 11519, 11588, 11617-11620, 20726, 20831-20836, 20863

v. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions.

RESPONSE

Everett Plant – New Monsanto's investigation identified documents containing employee lists. However, because New Monsanto was not involved in operating the Everett Plant, New Monsanto is not familiar with which employees may or may not have knowledge concerning information sought in EPA's request or this question. However, in an attempt to respond, New Monsanto compiled a list of plant managers, environmental specialists, environmental engineers, technical superintendents and any other employees who, solely by virtue of their title at the Everett plant, may have knowledge regarding the subject matter of this Information Request. The list is included as New Monsanto's response to Question #5c.

Indian Orchard - See response to Question #5c for a list of employees or former employees of the Indian Orchard Facility who may have knowledge regarding the subject matter of this Information Request.

6. Respondent's Environmental Reporting:

NOTE: All questions in this section refer to the period being investigated (1950-1985).

a. Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

RESPONSE

Everett Plant – Based on the attached documents, the Everett Plant had the following two EPA Identification numbers:

MAD001114818; and
MA0990894172

Indian Orchard - New Monsanto has found the following EPA Identification numbers:

Monsanto Indian Orchard Facility - MAD001114818
Monsanto Bircham Bend Plant - MAD041492406
Monsanto Springfield Plant - MAD001114818

These three numbers were taken from documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

43, 20926

b. Identify (see Definitions) all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information.

RESPONSE

Everett Plant – See documents at Tab 6.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

43-418, 419-612, 613-864, 1360-1832, 13809-13815, 15053-15060, 15061-15125,
16447-16449, 17280-17289, 19559-19564, 20924-20925

c. State the years during which such information was sent/filed.

RESPONSE

Everett Plant – See documents at Tab 6.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

43-418, 419-612, 613-864, 1360-1832, 13809-13815, 15061-15116, 15118-15125, 16444-16447, 17280-17289, 19559-19564, 20924-20925

d. Identify (see Definitions) all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information.

RESPONSE

Everett Plant – See documents at Tab 6.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

43-418, 419-612, 613-864, 1360-1832, 6179-6180, 13757-13790, 15053-15060, 17280-17289, 19559-19564, 21018-21323

e. State the years during which such information was sent/filed.

RESPONSE

Everett Plant – See documents at Tab 6.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

43-418, 419-864, 1360-1832, 6179, 6180, 13757-13790, 15053-15060, 17280-17289, 19559-19564, 21018-21323

f. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. §§ 1101 et seq. (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. §§ 1251 et seq. and equivalent state law.

RESPONSE

Everett Plant – See documents at Tab 6. The majority of documents include correspondence and memorandum regarding the plant's NPDES permit, its MDC Industrial User Discharge Permit, and air emissions reporting.

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

43-418, 419-612, 13757-13790, 13809-13815, 15061-15116, 15118-15125, 15366-15405, 15464-15487, 16093-16098, 16444-16447, 17280-17289, 20924-20925, 20925-21017, 21018-21200, 21318-21323

g. Identify (see Definitions) the federal and state offices to which such information was sent. Provide the full legal name and mailing address of the Respondent.

RESPONSE

Everett Plant – See documents at Tab 6. Based on these documents, the Everett Plant communicated with the following federal, state and local agencies with respect to environmental permits and regulations:

US EPA, Region I JFK Building Boston, MA 02203	D.A. Huebner, Director of the State and Solid Waste Program; Lester A. Sutton, Regional Administrator; Michael Deland, Regional Administrator; Harley Laing, Director of Air Management; Don Porteous, Water Quality Branch, and Bart Hague, Water Quality Branch.
Massachusetts Department of Environmental Quality Engineering 1 Winter Street Boston, MA 02108	S. Russell Sylva, Commissioner; William F. Cass, Director of Hazardous Waste, Thomas C. McMahon, Director of Water Pollution Control
MA Dept. of Environmental Quality Engineering, Northeast Office 5 Commonwealth Avenue Woburn, MA 01801	Kenneth Hagg, Director of Air Quality Control; Bruce K. Maillet, Deputy Director of Air Pollution control; Michael J. Maher, Chief, Air Quality Section; Kelly Weiscoff, Air Quality Engineer; Sabin M. Lord, NE Regional Engineer; J. Chalpin, Acting Regional Environmental Engineer NE Director of Hazardous Waste
Metropolitan District Commission Sewage Division 20 Somerset Street Boston, MA 02108	Noel D. Baratta, Director Sewage Division; Wayne T. Grandin, Chief Engineer of Industrial Waste
Region I Office, US Department of Labor 1618 North Street	Donald E. MacKenzie, Regional Administrator; Edwin J. Riley, Assistant

<i>One Dock Square Boston, MA 02102</i>	<i>Regional Administrator for Federal State Operations</i>
<i>US Dept. of Labor – OSHA 400-2 Totten Pond Road Waltham, MA 02154</i>	<i>John Fitarone, Area Director</i>
<i>State of Massachusetts Department of Labor Division of Occupational Hygiene 39 Boylston Street Boston, MA 02116</i>	<i>Harold Barley, Director</i>
<i>Department of Environmental Quality Engineering, Division of Air and Hazardous Materials Metropolitan Boston Air Pollution Control District 600 Washington Street, Room 320 Boston, MA 02111</i>	<i>Elise Camproni; Donald Squires</i>

Indian Orchard - New Monsanto has located information that is responsive to this question in documents with the following Bates numbers (each of the Bates numbers has the prefix "IndOrch"):

43-418, 419-612, 13757-13790, 16444-16447, 21018-21200

7. Information Concerning Respondent's Association with the Whitney Barrel Company

NOTE: All questions in this section refer to the period being investigated (1950-1985).

- a. Please describe Respondent's business association with the Whitney Barrel Company.
- b. Did your association with the Whitney Barrel Company involve the buying of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit your response to:
 - i. the dates of each pickup and delivery;
 - ii. the type(s) of container(s);
 - iii. the size(s) of the container(s);
 - iv. the condition of each container(s);
 - v. the contents (including but not limited to empty barrel residues) of each container including:
 - (a) the name of each material;
 - (b) the chemical composition of each material;
 - (c) the physical state of each material (e.g., solid, sludge, liquid);
 - (d) the volume of each material; and
 - vi. please include all documentation relating to these transactions.

c. Did your association with the Whitney Barrel Company involve the shipping, transport or selling of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit response to:

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
- iii. the size(s) of the container(s);
- iv. the condition of each container(s);
- v. the contents (including but not limited to empty barrel residues) of each container including
 - (a) the name of each material;
 - (b) the chemical composition of each material;
 - (c) the physical state of each material (e.g., solid, sludge, liquid);
 - (d) the volume of each material; and
- vi. please include all documentation relating to these transactions.

d. Did your association with the Whitney Barrel Company involve the cleaning and/or reconditioning of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit response to:

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
- iii. the size(s) of the container(s);
- iv. the condition of each container(s);
- v. the contents (including but not limited to empty barrel residues) of each container including
 - (a) the name of each material;
 - (b) the chemical composition of each material;
 - (c) the physical state of each material (e.g., solid, sludge, liquid);
 - (d) the volume of each material; and
- vi. please include all documentation relating to these transactions.

e. Did the Whitney Barrel Company ever perform any other service for you or your company? Unless an absolute "No", please explain. Include but do not limit your response to:

- i. the type of service(s);
- ii. the frequency of the service(s);
- iii. the date(s) of service(s); and
- iv. v. please include any documentation relating to these transactions.

f. Did Respondent ever pick up materials from other parties which were taken directly or indirectly to the Whitney Barrel Company (to be referred to as "customers" for purposes of this Information Request)? Unless your answer is an absolute "No", please explain.

g. Identify (see Definitions) all persons and entities from whom Respondent picked up materials which were taken directly or indirectly to the Whitney Barrel Company.

h. In addition to providing a list that identifies all such customers, provide for each pickup and delivery of materials to the Whitney Barrel Company:

- i. the dates of each pickup and delivery;
- ii. the type of container(s);
- iii. the size of the container(s);
- iv. the condition of each container(s);
- v. for each customer's materials taken to the Whitney Barrel Company describe:
 - (a) the nature of each material;
 - (b) the chemical composition of each material;
 - (c) the physical state of each material(e.g.,solid, liquid);
 - (d) the volume of each material; and
- vi. please include all documentation relating to your pickup and delivery of materials to the Whitney Barrel Company

i. Identify (see Definitions) all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had contact with Whitney Barrel Company.

RESPONSE

Everett Plant – New Monsanto has not found any documents responsive to Question #7 or any of its subparts. As such, New Monsanto does not believe the Everett Plant had any connection to the Whitney Barrel Company.

Indian Orchard - New Monsanto has not found any documents responsive to Question #7 or any of its subparts. As such, New Monsanto does not believe the Indian Orchard facility had any connection to the Whitney Barrel Company.

8. Information About Others

a. If you have information concerning the operation of the Site or the source, content or quantity of materials placed/disposed at the Site which is not included in the information you have already provided, provide all such information.

RESPONSE

Everett Plant –New Monsanto is not aware of other information.

Indian Orchard - New Monsanto is not aware of other information.

b. If not already included in your response, if you have reason to believe that there may be persons, including persons currently or formerly employed by Respondent, who are able to provide a more detailed or complete response to any of these questions or who

may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

RESPONSE

Everett Plant – Because Solutia owned the Everett plant and maintains its documents, Solutia personnel may have further knowledge or information regarding the questions contained in this request.

Indian Orchard - Because Solutia owns the Indian Orchard Facility and maintains its documents, Solutia personnel may have further knowledge or information regarding the questions contained in this request.

c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, the Site.

RESPONSE

Everett Plant – Other than former Everett plant employees and Solutia personnel, New Monsanto is not aware of other individuals with such knowledge or information.

Indian Orchard - Other than former Indian Orchard Facility employees and Solutia personnel, New Monsanto is not aware of other individuals with such knowledge or information.

9. Compliance with This Request

a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:

- i. the names of all individuals consulted;
- ii. the current job title and job description of each individual consulted;
- iii. the job title and job description during the period being investigated of each individual consulted;
- iv. whether each individual consulted is a current or past employee of Respondent;
- v. the names of all divisions or offices of Respondent for which records were reviewed;
- vi. the nature of all documents reviewed; and
- vii. the locations where those documents reviewed were kept prior to review; and
- vii. the location where those documents reviewed are currently kept.

RESPONSE

Monsanto reviewed Everett and Indian Orchard documents in Solutia's possession and control, as well as contacting the library in Everett, MA in the hopes of finding records on the Everett facility. Sharon Williams, formerly a paralegal with Solutia, was instrumental in providing New Monsanto with access to Solutia documents. Solutia searched its Environmental Insurance Litigation database for the term "Everett" and responded to Monsanto's request for documents by providing a 1000 page database printout listing storage file names that may relate to the 104(e) request. After reviewing the database printout, Monsanto identified files located in over 100 boxes of materials that it wished to review. Monsanto was given access to and began its review of the boxes on March 5, 2004 at Solutia's office. Monsanto has devoted at least four individuals to its initial Everett document review: Wanda Oldani and Kathy Conard of Bryan Cave and Diana Hutter and Ann Clark from Monsanto. The majority of the files for the Indian Orchard Plant are located at the plant in an archive library. Consequently, Monsanto assembled a team to travel to Solutia's Indian Orchard plant in Massachusetts and review documents located in 65 file cabinets stored on site. The following individuals reviewed documents at Indian Orchard: Matthew Fleming, Raymond Giraud, and Margaret Starczyk. All documents reviewed were and are still located at either Solutia's offices and/or Solutia's storage facility or the Indian Orchard facility.



Philip E. Karmel
Direct: 212-541-2311
Email: pekarmel@bryancave.com

April 8, 2004

VIA FEDERAL EXPRESS

Martha Bosworth, Enforcement Coordinator
Office of Site Remediation and Restoration (HBS)
U.S. Environmental Protection Agency
One Congress Street, Suite 1100
Boston, MA 02114

ATTN: Wells G&H Case Team

Re: EPA's December 15, 2003 Request for Information Pursuant to Section 104
of CERCLA in relation to the former Whitney Barrel Company at the Wells
G & H Superfund Site in Woburn, Massachusetts

Dear Ms. Bosworth:

This law firm represents Monsanto Company with respect to the above referenced
information request.

A response to the information request is being provided to EPA under separate
cover. Enclosed with this letter are (i) thirteen boxes of documents numbered
IndOrch 0000001 to IndOrch 0026498 that relate to the Indian Orchard facility in
Springfield, Massachusetts and (ii) an index of these documents.

Very truly yours,

Philip E. Karmel

Enc.

cc: Steven A. Poplawski, Esq.

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And Bryan Cave,
A Multinational Partnership,
London

MONSANTO INDIAN ORCHARD PLANT DOCUMENTS

File	Description	Bates Range
	Box 1	
1	Plant History (no date); Hydrocarbons & Polymers Division	0000001-0000026
2	General Facility and Disposal Site Information	0000027-0000042
3	Final Draft RCRA Facility Assessment	0000043-0000418
4	Hazardous Waste Permits and Notifications	0000419-0000612
5	Hazardous Waste Annual Reports	0000613-0000864
6	OSHA - HAZARDOUS MATERIALS - Chemicals in Springfield Plant - Standards for Specified Chemicals - Sampling and Testing - Monitoring	0000865-0001358
7	Supplemental RCRA Facility Investigation/MCP Phase II Comprehensive Site Assessment Report	0001359-0001832
	Box 2	
1	Chronology and Spills, Injuries (MI/OSHA), Reportables, Near Misses, Fire Reports 1985	0001833-0002334
2	Maintenance Standard Practices	0002335-0002342

3	Procedures, Policy for Indian Orchard Plant and Departments	0002343- 0002347
4	Plant Safety Security Bulletin # 302	0002348- 0002349
5	Personnel Training Requirements/Inspections	0002350- 0002362
6	Visitors Procedures	0002363- 0002367
7	Procedure Manual and Safe Practices	0002368- 0002377
8	Operations	0002378- 0002909
9	Cannons Engineering Corporation	0002910- 0002921
10	Cannons Engineering Corporation 1975	0002922- 0002940
11	Cannons Engineering Corporation 1976	0002941- 0003766
Box 3		
1	Cannons Engineering Corp. 1977 Receipts for Bills of Lading	0003767- 0004695
2	Cannons Engineering Corp. 1978 Receipts for Bills of Lading	0004696- 0005226
3	Cannons Engineering Corp. 1979 Receipts for Bills of Lading	0005227- 0005741
4	Cannons Engineering Corp. 1980 Memoranda regarding Hazardous Waste Disposal	0005742- 0005833

	Box 4	
1	Documents regarding the Silresin Superfund Site (1983-1984)	0005834- 0005856
2	Documents regarding the Western Sand & Gravel Superfund Site (1985)	0005857- 0005930
3	Documents regarding the Inmarcarltadt Disposal Superfund Site (1984)	0005931- 0005932
4	Documents regarding the Swope Oil Superfund Site (1984)	0005933- 0005943
5	Documents regarding the Byron Barrel and Drum Superfund Site (1984)	0005944- 0005956
6	Documents regarding the Renora Superfund Site (1984)	0005957- 0005993
7	Documents regarding the Panel Bradford Superfund Site (1985)	0005994- 0006015
8	Documents regarding Scientific Chemical Processing Superfund Site	0006016- 0006049
9	Ahearn Trucking Company disposal records	0006050- 0006275
10	Monsanto Company, Bircham Bend Plant Operations Manual	0006276- 0006814
11	Oil waste disposal records regarding PRC Resources, Northeast Oil Services and Monsanto (1975-1977)	0006815- 0006965
12	Cannons Engineering Corp. waste disposal records (1975-1980)	0006966- 0007142
13	Monthly hazardous waste disposal reports (1973-1981)	0007143- 0007320
14	Report to Lower Pioneer Valley Regional Resource Recovery Technical Committee on Feasibility of Solid Waste Disposal and Resource Recovery at Monsanto Springfield Plant (7/1978)	0007321- 0007442

15	Reports on "inactive" waste disposal sites (1973-1980)	0007443- 0007513
16	1984 Hazardous Waste Management Plan; Management Forms under RCRA (2/1989); year-end status report on MPRC's arrangements with outside processors (12/1977); Licenses for Hazardous Waste Collection (3/1975)	0007514- 0007590
17	Bircham Bend Superfund file; Comprehensive Environmental Response, Compensation and Liability Act of 1980; Monsanto Hazardous Waste/Superfund Position Statements (Preparedness Q&As Materials); "Superfund" Inactive Waste Facility Notification (5/1981); "Superfund and the States (circa 1980); Corporate Controller's Manual Inventory & Cost Accounting Procedures (3/1981)	0007591- 0007683
18	Various Documents, including Shipping Orders and Waste Management Records	0007684- 0007898
19	Bircham Bend Monthly Hazardous Waste Reports (1975-1980)	0007899- 0008161
Box 5		
1	Liquid Waste Packing Slips (1984)	0008162- 0008499
2	Liquid Waste Packing Slips (1985)	0008500- 0009202
3	Liquid Waste Packing Slips (1983, 1984)	0009203- 0009399
4	Bircham Bend Hazardous Waste Disposal Management Records (1980)	0009400- 0009800
5	Springfield Hazardous Waste Disposal Management Records (1979-1980)	0009801- 0009920
6	Springfield Hazardous Waste Disposal Management Records (1977-1978)	0009921- 0010068
7	Springfield Trash Disposal (1973-1974)	0010069- 0010130

8	Ahearn Trucking Co., Waste Removal Records (1973, 1974, 1975)	0010131- 0010164
9	Cyn Oil Corp., Waste Removal Records (1979-1980)	0010165- 0010332
	Box 6	
1	Pollution Abatement Services Waste Disposal Reports (1975-1976)	0010333- 0010521
2	Bircham Bend Waste Disposal Reports (1973-1974 & 1980)	0010522- 0010640
3	Bircham Bend Waste Disposal Reports (1976-1978)	0010641- 0010867
4	Bircham Bend Waste Disposal Reports (1980, 1982)	0010868- 0010917
5	Bircham Bend Waste Disposal Reports (1972-1975)	0010918- 0010999
6	GB International Packing Lists & Bills of Lading (1973-1974)	0011000- 0011301
7	Pollution Abatement Services Bills of Lading (1975-1976)	0011302- 0011620
8	Facility Assessment of SCA Chemical Services Company/Earthline Division by Monsanto Company for Hazardous Waste Management (1984)	0011621- 0011729
9	Bircham Bend Waste Disposal Site Survey "50 Year File" (6/79)	0011730- 0011874
10	Indian Orchard Hazardous Waste Inventories & Disposal Information (including 1974, 1977, 1979, 1980-1985)	0011875- 0012308
	Box 7	
1	Monsanto's Facility Assessment of Norlite Corporation (3/1984)	0012309- 0012462

2	List of Active and Inactive Waste Disposal Facilities	0012463- 0012478
3	Monsanto's Facility Assessment of Trade Waste Incineration and Ashland Chemical Company (1/84)	0012479- 0012529
4	Chemical Waste Management Inc. Product Surveys (1980's)	0012530- 0012901
5	TRC Environmental Consultants, Inc.'s "Ambient Air Monitoring Program at Monsanto: A Feasibility Study" (2/1984)	0012902- 0012951
6	Various Outside Waste Processor Forms	0012952- 0013151
7	Outside Processors Inspections (Late 70's & 80's)	0013152- 0013197
8	Field Investigation of Monsanto's Inactive Land Disposal Areas (5/1981); Samplings; Maps/Surveys; Hydro Study 1982; Final Report; Disposal Services by Ahearn Trucking	0013198- 0013808
9	Bridge Port Rental & Oil Services - Hazardous Waste Shipments to Rollins (1973-1976)	0013809- 0013938
10	Trash Disposal (1970-1971)	0013939- 0014283
Box 8		
1	On-site Hazardous Waste Inspections (including 1980-1985)	0014284- 0014779
2	Hazardous Waste Management Operating Records (1980-1981)	0014780- 0015533
3	Hazardous Waste Source Reduction & Pilot Incineration Program (1982-1984)	0015534- 0015785
4	Hazardous Waste Analysis Plan (including 1980-1985)	0015786- 0016165
5	Hazardous Waste Process/Waste Analysis (including 1980-1985)	0016166- 0016458

	Box 9	
1	Norlite Corp., Waste Disposal Records (Jan. - Jun. 1983)	0016459- 0016929
2	Norlite Corp., Waste Disposal Records (Jul. - Dec. 1983)	0016930- 0017767
3	Norlite Corp., Waste Disposal Records (1982)	0017768- 0017894
4	Chemical and Environmental Conservation Systems, Waste Disposal Records (1982)	0017895- 0017944
5	Mckesson Envirosystems Co., Waste Disposal Records (1982)	0017945- 0017974
6	Waste Management Records for Clean Harbors Inc.	0017975- 0018275
7	Chemical and Environmental Conservation Systems, Waste Disposal Records (1981)	0018276- 0018347
8	Norlite Corp., Waste Disposal Records (1981-1982)	0018348- 0018586
9	Industrial Environmental Systems, Waste Disposal Records (1980)	0018587- 0018813
	Box 10	
1	1985- Chemical Waste Management	0018814- 0018833
2	1985 Chemical Waste Management- Norlite	0018834- 0018960
3	1985 Chemical Waste Management- Oldover	0018961- 0019054
4	1985 Chemical Waste Management- Radiac	0019055- 0019073
5	1985 Chemical Waste Management- Rollins	0019074- 0019106

6	1985 Chemical Waste Management- Ross	0019107- 0019170
7	1985 Chemical Waste Management- SCA	0019171- 0019231
8	SCA Chemical Services- Newark 1985	0019232- 0019234
9	Chemical Waste Management-Clean Harbors 1984	0019235- 0019261
10	Chemical Waste Management- Norlite 1984	0019262- 0019347
11	Chemical Waste Management- Emelle 1983	0019348- 0019528
12	Chemical Waste Management-Evergreen- 1983	0019529- 0019533
13	Chemical Waste Management- Clean Harbors, Inc. 1983	0019534- 0019548
14	Chemical Waste Management- Clean Harbors, Inc. 1983	0019549- 0019558
15	Commercial Disposal Co.	0019559- 0019564
16	Hazardous Waste Management- Franklin Pumping 1983	0019565- 0019606
17	Non-Hazardous- Special Waste Shipments 1983	0019607- 0019609
18	Ross Incineration Services 1983	0019610- 0019755
19	1984- Chemical Waste Management	0019756- 0019881
20	SCA Chemical Services- 1984	0019882- 0020031

21	1984 Chemical Waste Management- Oldover	0020032- 0020120
22	1984 Ross Incineration	0020121- 0020192
23	Inland Pollution Control Waste Management 1984	0020193- 0020195
24	Jetlines Waste Management 1984	0020196- 0020200
25	Transformer Service Waste Management 1984 (TSI)	0020201- 0020232
26	Rollins Environmental Services 1983	0020233- 0020249
Box 11		
1	Materials on standard procedures and training (Various dates)	0020250- 0020266
2	Procedures on Liquid Waste Disposal (1/1977)	0020267- 0020350
3	Waste Disposal Records (1975-1977)	0020351- 0020869
4	Plant Safety - Security Bulletin (10/1976); North Central Region Waste Disposal Plan (1980-1982); "Administering Waste Disposal Contracts" (7/1981)	0020870- 0020928
5	Hazardous Waste Training Material (1983)	0020929- 0020952
6	Hazardous Waste Training Material (1981)	0020953- 0020972
7	Hazardous Waste Training Material (1984)	0020973- 0021016
8	Annual Hazardous Waste Reports (1981-1985)	0021017- 0021200

9	Manifest Discrepancy Reports (1983-1985)	0021201- 0021324
10	Hazardous Waste Shipments to Norlite (1984)	0021325- 0021335
11	Hazardous Waste Shipments to Oldover (1984)	0021336- 0021348
12	Hazardous Waste Shipments to Ross (1984)	0021349- 0021379
13	Hazardous Waste Shipments to Chemical Waste Management (1984)	0021380- 0021405
14	Hazardous Waste Removal Records from CleanHarbors and Jet- Line (1984)	0021406- 0021691
15	Hazardous Waste Shipments to Ross (1985)	0021692- 0021740
16	Records of various waste removal companies (1985)	0021741- 0022300
17	Hazardous Waste Disposal Records for Emelle Landfill (1984)	0022301- 0022601
18	Hazardous Waste Shipments to Ross (1984)	0022602- 0022772
Box 12		
1	SF v. Picillo- Recycling Industries Solutia No Series V02256-V02545	022773- 0022881
2	Recycling Industries Inc. Miscellaneous Material	002282- 0023062
3	SF v. Picillo- Applied Technology	0023063- 0023233
4	SF v. Picillo- Lewis Chemical Corp.	0023234- 0023448
5	SF AC Picillo- Flammable Waste Disposal Cost	0023449- 0023485

6	SF AD Picillo- Solvent Recovery Services	0023486- 0023489
7	SF AE Picillo- Liquidator	0023490- 0023503
8	SF AF Picillo- Chemical Recovery Inc.	0023504- 0023513
9	SF AH Picillo- Commercial Disposal	0023514- 0023524
10	SF AI Picillo- Waste Disposal. General File. John Mumper	0023525- 0024264
11	SF AL Picillo- Robert Ross & Sons Invoices	0024265- 0024361
12	SF AM Picillo- BFI	0024362- 0024386
13	SF AN Picillo- Coastal Services	0024387- 0024546
14	Coastal Services- Coastal Oil Boom Pamphlet	0024547- 0024578
15	SF AA Picillo- Great Lakes Container	0024579- 0024650
16	SF H Picillo- Great Lakes Container Invoices	0024651- 0024787
17	Folder AA- Great Lakes Container (Kingston) 1979	0024788- 0024820
18	SF AR Picillo- Morgan Chemicals	0024821- 0024835
19	SF AT Picillo- Bircham Bend Hazardous Waste 1976-1978	0024836- 0025026
20	SF AU Picillo- Springfield Hazardous Waste 1976: Bob Brazas File	0025027- 0025103

21	SF AV Picillo- Bircham Bend Hazardous Waste 1979. Larry Gormally File	0025104-0025329
22	SF AX Picillo- Miscellaneous Hazardous Waste	0025330-0025439
	Box 13	
1	Chemical Waste Management Hazardous Waste Disposal Records (1985)	0025440-0025811
2	Norlite Hazardous Waste Disposal Records (Jul.-Dec. 1985)	0025812-0026190
3	Norlite Hazardous Waste Disposal Records (Jan.-June 1985)	0026191-0026412
4	Rollins Hazardous Waste Disposal Records (1985)	0026413-0026498

W000004 4000-0000 GETTS DISOL

100-100000

1017 000 4520

Charles F. Jones 02/14/94

TERMS:

2430-2195

DATE *8-17-77*

CUSTOMER REFERENCE

SALESMAN REFERENCE

VIA *West Coast*

[illegible]

TRIPLICATE

Thank You!

REDACTED

0036-0157

Phone 933-4520 - 21

**All claims and returned goods
MUST be accompanied by this bill.**

SERIES 610

Thank You

0036-0158

WHITNEY BARREL CO. INC.

Complete Drum Reconditioning

Established 1899

All Types of Steel Drums - Fire Barrels - Purchases - Sales

250 Salem Street - Woburn, Mass. 01801

Phone 933-4590 - 21

CUSTOMER'S ORDER NO.		PHONE		DATE	
				8-17-79	
NAME					
Moneta					
ADDRESS					
Charlotte, Mass.					
SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT.	MOSE. RETO.
PAID OUT					
QTY	DESCRIPTION			PRICE	AMOUNT
92	Heron 479				
	H.C. F. 1/2				
	del. to P. unit 40				
	350				
	92				
	700				
	50				
	315				
	32				
RECEIVED BY				TAX	
				TOTAL	

All claims and returned goods
MUST be accompanied by this bill.

Thank You

2195

Form 810-8 - Available from **NBSB**, Torrington, Mass. 01469

MAILING ADDRESS: P. O. Box 201
WILMINGTON, MASSACHUSETTS 01801

NY 100-8032

157 832-4520

Alfreda Morse 02149

DATE *P-17-79*

CUSTOMER ORDER NO. *5229*

SALES *[Redacted]*

VIA *West Coast*

20730 # 1727

[illegible]

Thank You!

0036-0160

Phone 933-4520 - 21

Thank You

0036-0161

Established 1948

252 Salem Street Woburn Mass. 01801

Phone 935-4520 • 25

All claims and returned goods
MUST be accompanied by this bill.

Thank You

Form 610-3 Available from  Townsend, Mass. 01469



Tara K. Callahan
Direct: (314) 259-2457
tkcallahan@bryancave.com

November 18, 2005

VIA FEDERAL EXPRESS

Martha Bosworth
Enforcement Coordinator
U.S. Environmental Protection Agency
Office of Site Remediation and Restoration
One Congress Street, Suite 1100
Boston, MA 02114

ATTN: Wells G&H Case Team

Re: CERCLA 104(e) Supplemental Request for Information Concerning Whitney
Barrel Company at the Wells G & H Superfund Site in Woburn, MA

Dear Ms. Bosworth:

This letter and its attachments respond to the above referenced request for information ("Supplemental Request") addressed to Monsanto Company ("New Monsanto") regarding the Whitney Barrel Company at the Wells G & H Superfund Site in Woburn, Massachusetts (the "Site"). Due to contractual obligations and despite the fact that the subject matter of the request relates to historic Pharmacia Corporation ("Pharmacia" or "Old Monsanto") operations, New Monsanto is responding to this request on behalf of Pharmacia. New Monsanto received the Supplemental Request on August 22, 2005. EPA granted New Monsanto's requests for extension, through November 21, 2005, in which to submit a supplemental response. See September 15, 2005 and October 13, 2005 Written Confirmations of Extension.

New Monsanto objects to the Supplemental Request for the following reasons:

First, New Monsanto objects to EPA sending the Supplemental Request directly to New Monsanto. EPA's initial 104(e) information request was correctly addressed to Pharmacia. As discussed in New Monsanto's March 24, 2004 response to the initial information request submitted on behalf of Pharmacia (the "Initial Response"), New Monsanto has no connection with the historical chemical business operations addressed by the initial or supplemental requests. Accordingly, future correspondence regarding this matter should be addressed to: Pharmacia Corporation c/o Monsanto

Bryan Cave LLP
One Metropolitan Square
211 North Broadway
Suite 3600
St. Louis, MO 63102-3710
Tel: (314) 259-2000
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Chicago
Hong Kong
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Jefferson City
Kansas City
Newark
Los Angeles
New York
Phoenix
Riyadh
Shanghai
St. Louis
Tampa, FL and New York, NY
Washington, DC
And Bryan Cave
in the United Kingdom
London

Company, its attorney-in-fact, 800 North Lindbergh, Mail Code E2NE, St. Louis, MO 63167, Attn: Molly Shaffer.

Second, New Monsanto objects to the broad definition of "Monsanto" as confusing given the time period, 1973 to 1980, covered by the Supplemental Request. See Supplemental Information Request Definitions at page 1 of 6. New Monsanto, the current Monsanto Company, did not exist until 2000, twenty years after the relevant time period.¹⁷ Moreover, New Monsanto is a completely separate and independent corporation from Pharmacia or any of its affiliates. Thus, for purposes of this supplemental response, New Monsanto is treating references to "Monsanto" or "Respondent" in the Supplemental Request as if they were references to Pharmacia.

Third, the request requires Pharmacia to provide information regarding facilities it does not own or control. As a result of the corporate transactions described in the Initial Response, Pharmacia is not in possession of the documents of any facilities that may have a connection to the Site.

Fourth, New Monsanto disputes EPA's overly broad assertion of authority under CERCLA and RCRA.

Finally, New Monsanto objects to the overly broad scope of the information sought in this 104(e) request, as well as the unreasonable time period covered, going back over thirty years.

Despite our objections, in the interest of preserving New Monsanto's relationship with the EPA and given New Monsanto's policy of cooperation with government agencies, New Monsanto is responding to EPA's request while at the same time reserving all objections and defenses to EPA's statement of authority. New Monsanto's response is included as Attachment A. As agreed by Susan Scott, this response is limited to information related specifically to the Everett and Indian Orchard facilities, the only two Old Monsanto facilities identified as being relevant in the Initial Response. Consequently, New Monsanto's responses to any questions asking to describe "Monsanto's" operations, practices, etc., are limited to information regarding Old Monsanto's activities at the Everett and Indian Orchard facilities.

New Monsanto's additional search for documents relating to the Supplemental Request did not uncover any information connecting the Everett and Indian Orchard facilities to Whitney Barrel. New Monsanto conducted its investigation for information by reviewing Everett and Indian Orchard documents in Solutia Inc.'s possession and control. In addition, New Monsanto attempted to contact former Everett and Indian Orchard employees who may have knowledge regarding the Supplemental Request questions. As with its review under the initial Information Request, New Monsanto's search

¹⁷ Refer to New Monsanto's detailed explanation of the corporate transactions resulting in New Monsanto's formation contained in the Initial Response.

Martha Bosworth
November 18, 2005
Page 3

Bryan Cave LLP

for additional information under this Supplemental Request has not found any information that establishes a connection between Old Monsanto and the Site, nor any business relationship between Old Monsanto and Whitney Barrel. Because there is no information or documents establishing Old Monsanto's disposal or arrangement for disposal of CERCLA hazardous substances at the Site, New Monsanto continues to believe Old Monsanto has no potential CERCLA liability for the Site.

Best regards,

A handwritten signature in black ink, appearing to read "Tara K. Callahan", with a long horizontal flourish extending to the right.

Tara K. Callahan

TKC

Enclosures

cc: Susan Scott, US EPA Enforcement Counsel
Bruce A. Marshall, US EPA Search and Cost Recovery Section
Molly Shaffer

ATTACHMENT A
New Monsanto's Response on Behalf of Pharmacia Corporation
to USEPA'S Supplemental 104(e) Request for Information
Regarding Whitney Barrel at the Wells G & H Superfund Site in Woburn, MA

Period Being Investigated: 1973 to 1980

Note: All questions refer to the period being investigated unless otherwise indicated.

As EPA's Susan Scott agreed, New Monsanto limits its response below to information related to Old Monsanto's Everett and Indian Orchard facilities. New Monsanto did not exist until 2000, twenty years after the end of the period being investigated.

INFORMATION REQUEST QUESTIONS

I. Information Concerning Respondent's Association with Whitney Barrel

1. Please describe what you did with the containers formerly containing the raw materials used in your operations (i.e., reuse, recycle, dispose, etc.).

Please refer to the response provided to Question 4(c) in section II and Question 1 of Section III of this request.

2. Please identify each Monsanto facility which had a relationship with Whitney Barrel.

As discussed in New Monsanto's response to EPA's initial 104(e) Information Request relating to the Site, New Monsanto did not identify any Old Monsanto facility having a relationship with Whitney Barrel, nor any connections whatsoever between Pharmacia and Whitney Barrel. Moreover, New Monsanto's subsequent investigation following EPA's Supplemental Request similarly did not identify any connection between Pharmacia and the Site. Accordingly, New Monsanto has no information responsive to the remaining questions in this section.

3. For each shipment of used containers to Whitney Barrel, please provide:

New Monsanto did not identify any shipments of containers from Pharmacia to Whitney Barrel. As such, New Monsanto has no information responsive question 3 (a) – (i).

- a. The dates of each pickup and delivery;
- b. The number of containers;
- c. The type(s) of containers;
- d. The size(s) of the containers;
- e. The condition of each container;
- f. The original and any subsequently added contents (i.e., bulk raw material storage, finished product packaging, and/or waste storage), including but not limited to empty barrel residues, of each container including:
 - i. the name of each material;
 - ii. the chemical composition of each material;
 - iii. the physical state of each material (e.g., solid, sludge, liquid);

- iv. the volume of each material;
- g. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pickup/delivery;
- h. A description of how Respondent disposed of any emptied materials and/or rinse water; and
- i. Any documentation or additional information regarding these transactions.

II. Information Concerning Respondent's Shipment of Containers and/or Tanks to Kingston Steel Drum (a/k/a Great Lakes Container Corporation)

Please note that New Monsanto did not identify any relationship or transactions between the Everett facility and Kingston Steel Drum (aka Great Lakes Container Corporation). As such, questions 1-3 of this section will only reference information pertaining to the Indian Orchard facility.

1. In your 104(e) response, you provided invoices, receipts, and bills of lading dated from January 1978 through March 1980 indicating that Monsanto sent/delivered "empty" drums to Kingston Steel Drum and Great Lakes Container Corporation for recycling. Please describe what you mean by your reference to "empty" drums.

New Monsanto did not identify any information explaining the reference to the word "empty" in Old Monsanto's invoices, receipts, and bills of lading dated from January 1978 through March 1980. As such, New Monsanto has no information responsive question 1.

Because New Monsanto found no information regarding the word "empty" in its invoices, receipts, and bills of lading dated from January 1978 through March 1980, New Monsanto attempted to contact current or former Indian Orchard plant personnel for further information. New Monsanto was successful in contacting one individual with an opinion as to the meaning of the word "empty" in the above documents: Roy Hart, who is employed as the Environmental Protection Lead at the Indian Orchard Plant of Solutia in Springfield, Massachusetts and who has occupied various positions with the Indian Orchard facility since 1980. Mr. Hart indicated that, if the above documents used the word "empty" to refer to barrels, then it is likely that "empty" means that all of the material that could be removed from the barrels through normal manufacturing techniques had been removed when the barrels were sent/delivered to Kingston Steel Drum.

2. For each transaction with Kingston Steel Drum and Great Lakes Container Corporation, please provide:
 - a. The dates of each pickup and delivery;
 - b. The number of containers;
 - c. The type(s) of containers;
 - d. The size(s) of the containers;
 - e. The condition of each container;
 - f. The original and any subsequently added contents (i.e., bulk raw material storage, finished product packaging, and/or waste storage), including but not limited to residues, of each container including:
 - i. the name of each material;
 - ii. the chemical composition of each material;
 - iii. the physical state of each material (e.g., solid, sludge, liquid);

- iv. the volume of each material;
- g. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery.
- h. A description of how Respondent disposed of any emptied materials and/or rinse water; and
- i. Any documentation or additional information regarding these transactions.

New Monsanto previously provided information and documents that are responsive to this question in its response to EPA's initial 104(e) request. As such, please refer to the following documents with the following bates numbers, which were already provided to EPA (each of the bates numbers has the prefix "IndOrch"):

0007087, 0007108-0007110, 0024579-0024820

The information that is in these documents and is responsive to this question is as follows:

DATE SHIPPED FROM INDIAN ORCHARD TO KINGSTON STEEL DRUM CO.	NO. OF DRUMS	DESCRIPTION OF DRUMS
1/31/78	214	55-Gal. Top Fill Drums
1/31/78	15	55-Gal. Open Head Drums
1/31/78	10	17-H Drums
1/4/78	161	55-Gal. Top Fill Drums
1/4/78	15	55-Gal. Open Head Drums
1/4/78	14	17-H Drums
2/6/78	91	55-Gal. Top Fill Drums
2/6/78	10	55-Gal. Open Head Drums
2/6/78	73	17-H Drums
2/15/78	166	55-Gal. Top Fill Drums
2/15/78	4	55-Gal. Open Head Drums
2/15/78	30	17-H Drums
2/22/78	100	55-Gal. Top Fill Drums
2/22/78	71	17-H Drums
2/22/78	10	Scrap Drums
2/27/78	10	Empty Open Head Steel Drs(Lock Rim)
2/27/78	80	Empty Open Head Steel Drs(Bolt Rim)
2/27/78	10	Empty Tight Head Steel Drums
2/27/78	8	Junks
3/10/78	70	55-Gal. Top Fill Drums
3/10/78	20	55-Gal. Open Head Drums
3/10/78	4	17-H Drums
3/10/78	9	Scrap Drums

3/20/78	50	55-Gal. Top Fill Drums
3/20/78	58	17-H Drums
4/3/78	180	55-Gal. Top Fill Drums
4/3/78	36	55-Gal. Open Head Drums
4/20/78	159	55-Gal. Top Fill Drums
4/24/78	142	55-Gal. Top Fill Drums
4/24/78	46	55-Gal. Top Drums
5/3/78	100	55-Gal. Top Fill Drums
5/3/78	8	55-Gal. Open Head Drums
5/3/78	53	17-H Drums
5/9/78	20	55-Gal. Top Fill Drums
5/9/78	43	17-H Drums
5/9/78	7	Scrap Drums
5/12/78	98	55-Gal. Top Fill Drums
5/12/78	32	55-Gal. Open Head Drums
6/12/78	214	55-Gal. Top Fill Drums
6/12/78	20	55-Gal. Open Head Drums
7/6/78	85	55-Gal. Top Fill Drums
7/6/78	91	55-Gal. Open Head Drums
7/6/78	44	17-H Drums
7/6/78	6	Scrap Drums
7/11/78	140	55-Gal. Top Fill Drums
7/11/78	25	55-Gal. Open Head Drums
7/11/78	52	17-H Drums
7/11/78	12	Scrap Drums
7/13/78	35	55-Gal. Top Fill Drums
7/13/78	40	17-H Drums
7/17/78	108	55-Gal. Top Fill Drums
7/17/78	6	Scrap Drums
8/2/78	152	55-Gal. Top Fill Drums
8/2/78	2	17-H Drums
8/2/78	1	Poly Drums
8/2/78	5	Scrap Drums
8/11/78	109	55-Gal. Top Fill Drums
8/11/78	10	55-Gal. Open Head Drums
8/11/78	19	17-H Drums
8/23/78	180	55-Gal. Top Fill Drums
8/23/78	10	55-Gal. Open Head Drums
8/23/78	29	17-H Drums
8/23/78	10	Scrap Drums
9/6/78	195	55-Gal. Top Fill Drums
9/6/78	10	17-H Drums
9/7/78	126	55-Gal. Top Fill Drums
9/7/78	22	17-H Drums

9/26/78	82	55-Gal. Top Fill Drums
9/26/78	7	55-Gal. Open Head Drums
9/26/78	150	17-H Drums
9/26/78	1	Scrap Drums
9/29/78	83	55-Gal. Top Fill Drums
9/29/78	11	55-Gal. Open Head Drums
9/29/78	62	17-H Drums
9/29/78	1	Scrap Drums
10/4/78	85	55-Gal. Top Fill Drums
10/4/78	76	17-H Drums
10/4/78	5	Scrap Drums
10/6/78	46	55-Gal. Top Fill Drums
10/6/78	12	55-Gal. Open Head Drums
10/6/78	10	17-H Drums
12/12/78	163	17-H Drums
12/14/78	46	55-Gal. Top Fill Drums
12/14/78	87	17-H Drums
1/5/79	84	55-Gal. Top Fill Drums
1/5/79	31	55-Gal. Open Head Drums
1/5/79	48	17-H Drums
1/19/79	113	55-Gal. Top Fill Drums
1/19/79	15	55-Gal. Open Head Drums
1/19/79	45	17-H Drums
1/30/79	113	55-Gal. Top Fill Drums
1/30/79	15	55-Gal. Open Head Drums
1/30/79	45	17-H Drums
2/2/79	96	55-Gal. Top Fill Drums
2/2/79	48	17-H Drums
2/3/79	70	55-Gal. Top Fill Drums
2/3/79	14	55-Gal. Open Head Drums
2/3/79	1	17-H Drums
2/21/79	60	55-Gal. Top Fill Drums
2/21/79	32	55-Gal. Open Head Drums
2/23/79	73	55-Gal. Top Fill Drums
2/23/79	70	55-Gal. Open Head Drums
2/23/79	14	17-H Drums
2/28/79	100	55-Gal. Top Fill Drums
2/28/79	50	17-H Drums
3/26/79	63	55-Gal. Top Fill Drums
3/26/79	20	17-H Drums
3/26/79	83	Scrap Drums
4/6/79	100	55-Gal. Top Fill Drums
4/6/79	11	55-Gal. Open Head Drums
4/6/79	100	17-H Drums

6/1/79	200	55-Gal. Top Fill Drums
6/1/79	10	55-Gal. Open Head Drums
6/1/79	2	17-H Drums
6/1/79	8	Scrap Drums
6/7/79	61	55-Gal. Top Fill Drums
6/7/79	32	17-H Drums
6/7/79	3	Scrap Drums
6/20/79	112	55-Gal. Top Fill Drums
6/20/79	100	17-H Drums
7/2/79	169	55-Gal. Top Fill Drums
7/2/79	62	17-H Drums
12/12/79	100	55-Gal. Top Fill Drums
12/12/79	68	17-H Drums
12/12/79	163	17-H Drums
12/12/79	3	Junk Drums
3/10/80	196	55-Gal. Top Fill Drums
3/10/80	6	55-Gal. Open Head Drums
3/10/80	25	17-H Drums
3/10/80	196	55-Gal. Top Fill Drums
3/10/80	6	55-Gal. Open Head Drums
3/10/80	25	17-H Drums

DATE SHIPPED BY CANNONS ENGINEERING CORP. TO KINGSTON STEEL DRUM CO.	NO. OF DRUMS	DESCRIPTION OF DRUMS
09/21/76	115	None
12/14/76	221	None
10/17/77	238	None
10/27/77	240	None
11/21/77	240	None

3. Some of the receipts indicate that the last content in the "empty" drums was "resin flammable liquid." Please describe the chemical composition, physical state, and volume of "resin flammable liquid" present in the containers sold to Kingston Steel Drum and Great Lakes Container Corporation.

New Monsanto did not identify any information describing the chemical composition, physical state, and volume of "resin flammable liquid" present in the containers sold to Kingston Steel Drum and Great Lakes Container Corporation. As such, New Monsanto has no information responsive to question 3.

Because New Monsanto found no information regarding the words "resin flammable liquid" in Old Monsanto's invoices, receipts, and bills of lading dated from January 1978 through March 1980, New Monsanto attempted to contact former or current Indian Orchard plant personnel in order to understand the meaning of the words "resin flammable liquid". New Monsanto was successful in contacting one individual with an opinion as to the meaning of the words "resin flammable liquid" in the above documents: Roy Hart, who is employed as the Environmental Protection Lead at the Indian Orchard Plant of Solutia in Springfield, Massachusetts and who has occupied various positions with the Indian Orchard facility since 1980. Mr. Hart indicated that he is unsure of the meaning of the words "resin flammable liquid" in the above documents. However, Mr. Hart explained that he believed that between 1978 and 1980 there were three units that produced resins at the Indian Orchard facility. The first unit produced polyvinyl acetate, the second unit produced acrylic resin adhesives, and the third unit produced formaldehyde resin used for wire coating material. Mr. Hart thought that the words "resin flammable liquid" likely referred to waste products from one of these three units, but he did not know which of the three.

4. Describe Monsanto's handling and disposal practices for leaking and/or defective containers including:
 - a. How Monsanto handled and disposed of the leaking raw material and/or waste material;
 - b. The names of each contractor, company, and/or facility used to dispose of the leaking raw material and/or waste material; and
 - c. The names of each contractor, and/or facility used to dispose of these defective containers.

Everett: New Monsanto previously provided information and documents regarding the Everett facility's handling of containers in its response to EPA's initial 104(e) request question #3(h) and produced relevant documents at Tab 3(h) to New Monsanto's response. Please refer to the following documents already provided to EPA:

- *MERIT Drums and Cylinders: Patching and Handling Training Document, bates numbered EVERETT 02471-02528, discussing drum repair kits, recovery drums, emergency response drum plugs and wedges and drum repair vendors.*
- *Plasticizer Spill Control Plan, bates numbered EVERETT 02241-02251, discussing the basic operator responsibilities in the event of raw material spills and directing operators to "during transfer, walk line to inspect for leaks. All leaks must be captured, and if possible, repair leaks. Report any other leaks or problems that require repairs."*
- *In Service Training document, bates numbered EVERETT 02340-02343, discussing effective emergency response with tank truck incidents and listing the emergency response investigator responsibilities.*
- *Clean Industry, Inc. invoice, bates numbered EVERETT 02401-02418, relating to the clean up of a 1984 plasticizer spill.*

- MERIT Highway Tank Vessel Operation Manual, bates numbered EVERETT 02624-02665, describing the various tank vessels and inspection and maintenance procedures.

Indian Orchard: New Monsanto previously provided information and documents regarding the facility's handling of containers in its response to EPA's initial 104(e) request question #3(b) and produced relevant documents with New Monsanto's response. As such, please refer to the documents with the following bates numbers, which were already provided to EPA (each of the bates numbers has the prefix "IndOrch"):

0000092-0000094, 0001833-0002334, 0002378-0002909, 0006442-0006448, 00 21318-0021323, 0024420-0024430

These documents include the following:

- Chronology and Spills, Injuries, Reportables, Near Misses, Fire Reports 1985
- Comprehensive Bircham Bend Plant Operations Manual
- Division of Hazardous Waste Report 6/3/82

III. Information Concerning Respondent's Association with any other Drum Reconditioning and/or Recycling Companies

1. State whether Respondent sent/delivered containers to any other drum reconditioning/recycling company, including but not limited to, Edward C. Whitney & Son, Inc. (also known as E. C. Whitney), Kingsland Drum Company, Roche Brothers Barrel & Drum Co., Roy Brothers, Inc., Ryan Barrel Company, and Woburn Barrel.

Everett:

Based on a lack of documentation, New Monsanto does not believe that the Everett facility handled or generated many used drums. Moreover, while New Monsanto identified and previously provided to EPA many documents describing the Everett facility's waste disposal practices, not one of these documents contains information regarding Everett relationships with drum recycling or disposal companies. For information on how the Everett facility may have handled some drums, please refer to the following documents provided to EPA as part of New Monsanto's response to EPA's initial 104(e) response relating to the Site:

- Documents included at Tab 4(b), showing Everett relationships with the following waste handlers: RESCO, Inc. (incineration); Norlite Corporation (incineration); CECOS International, Niagara Falls, NY (hazardous landfill); Chemical Waste Management (hazardous waste landfill); Ross Incineration Services (incineration); Rollings Environmental Services Co. (incineration); Oldover Corporation (incineration); CECOS, Williamsburg, OH (incineration); Clean Harbors (oil reprocessor, including waste machine oil in drums); Thermal-keem (incineration); Advanced Environmental Technology Corporation (incineration); Transformer Services, Inc.; BFI Sanitary Landfill (landfill); SPFLD (regional wastewater treatment plant); Zielinski Brothers (sanitary landfill)
- July 5, 1981 Document bates numbered EVERETT 03066 regarding Acetic Acid Empty Drums and stating "the empty acetic acid drums (no more than 1" of material remaining). . ."

- *Waste Disposal Plan, bates numbered EVERETT 03374-03387, listing primary and secondary waste vendors and stating at page EVERETT 03379 "qualify secondary drum incineration vendor during 1981 as back-up to RESCO."*
- *Rollings Environmental Services Inc. May 29, 1985 Proposal for Services, bates numbered EVERETT 03435 -03439, proposing to remove drums with "tar-like material" to Rollings Environmental Services in Bridgeport, NJ for incineration.*
- *May 7, 1985 Clean Industry, Inc. Purchase Order, bates numbered EVERETT 03451, proposing to provide labor and equipment for the removal of drums and clean up of the North area of the plant.*
- *October 19, 1981 Rollings Environmental Services Proposal, bates numbered EVERETT 03530 - 03561, proposing to remove and dispose of PCB liquids in drums with a vacuum trailer and filtration system. Following liquid removal, Rollings Environmental Services proposed to rinse the drums three times per 40 CFR §761.43 with solvent supplied by Monsanto and then proposed to neatly stack or place the drums aside.*
- *February 13, 1980 Waste Disposal Agreement between Monsanto and CECOS International Inc., bates numbered EVERETT 03631-03645, in which CECOS agrees to "dispose of certain industrial waste materials (including non-returnable containers provided by Monsanto to ship or store the same . . .)"*

In addition to previously produced documents, as part of its investigation for information relevant to EPA's Supplemental Request, New Monsanto identified the following three (3) additional documents:

- *November 22, 1983 Correspondence from J. Doyle to J. Edwards, State Waste Program, document bates numbered EVERETT 05553-05554, which requests the state to de-list a waste pile formerly used as a hazardous waste storage area. In its request, the Everett facility indicates that the pile was used up until May 1981 as a temporary holding area to allow complete polymerization of Scripset 540 press leakage in fiber drums and that when the material completely solidified, Everett sent it to RESCO for incineration.*
- *Beta Nitrostyrene Training Document, bates numbered EVERETT 05555-05558, discussing proper disposal and instructing personnel to place drums on slop pads and inform maintenance to remove the drums to the Scripsets Hazardous waste dumpster, the contents of which were later removed from the plant by the Charles Lee Company.*

Because New Monsanto found very little information regarding the Everett facility's used drum management, New Monsanto attempted to contact former Everett plant personnel. New Monsanto was successful in contacting two individuals with a recollection regarding drum disposal and management issues: Richard Cushing, who held various positions at Everett between 1978 and 1991, and Jerry Rinaldi, who from 1994 to 1997 was Pharmacia's project manager responsible for remediating the Everett facility.. Mr. Cushing indicated that the Everett facility did not consume a lot of drums and had very few empty drums because most of the raw materials and finished products were transported via either tank cars, tank truck or barges out of the Boston Harbor. Mr. Cushing explained that the Everett facility did not use drummed containers for tank car, tank truck or barge shipments. Nonetheless, when the facility did manage empty drums, Mr.

Cushing indicated that the facility would triple rinse the drums and then throw them away. Mr. Cushing was not aware of any relationship between the Everett facility and any drum recycling or disposal companies. Additionally, Mr. Rinaldi was not aware of any relationships between the Everett facility and any drum recycling or disposal companies.

Indian Orchard:

Based on a lack of documentation, New Monsanto does not believe that the Indian Orchard facility handled or generated many used drums. To the extent that Old Monsanto dealt with Kingston Steel Drum Co., either directly or indirectly, please refer to the response provided to Question 2 in section II of this request. In addition, Old Monsanto may have dealt with Roche Brothers Barrel as a document bates numbered "IndOrch 0025069" states "Drums to recondition... Kingston-Kingston, N.H. Roche Bros.-Lowell". However, although the documents bates numbered "IndOrch 0013002", "IndOrch 0013038", "IndOrch 0013045", and "IndOrch 0013164" are not responsive to this request because they fall outside the relevant date range, these documents state that the Indian Orchard facility did not have a contract with Roche Brothers Barrel, located in Lowell, Massachusetts.

Because New Monsanto found very little information regarding the Indian Orchard facility's used drum management, New Monsanto attempted to contact former Indian Orchard plant personnel for further information. New Monsanto was successful in contacting one individual with a recollection regarding drum disposal and management issues: Roy Hart, who is employed as the Environmental Protection Lead at the Indian Orchard Plant of Solutia in Springfield, Massachusetts and who has occupied various positions with the Indian Orchard facility since 1980. Mr. Hart indicated that in the time he has been with Solutia and Old Monsanto, he was only aware of one company that the Indian Orchard facility used to recondition its drums: New England Container. Only one document, bates stamped "IndOrch 0004724", indicated the possibility of a relationship between Indian Orchard and New England Container during the years 1973 through 1980. Additionally, Mr. Rinaldi indicated that he believed the Indian Orchard facility sent drums to reclaimers and specifically recalled a relationship with the Bayonne Barrel and Drum site in New Jersey. However, New Monsanto's investigation did not identify any documents confirming a relationship or any transactions between Indian Orchard and Bayonne Barrel and Drum.

2. For each company identified above, please describe:

- a. The full name of each company or individual;
- b. The full address for each company or individual;
- c. How frequently you sent/delivered containers to each company;
- d. The time period during which containers were sent/delivered;
- e. The original and any subsequently added contents (i.e., bulk raw material storage, finished product packaging, and/or waste storage), including but not limited to residues, of each container sent/delivered including:
 - i. the name of each material;
 - ii. the chemical composition of each material;
 - iii. the physical state of each material (e.g., solid, sludge, liquid);
 - v. the volume of each material;
- f. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery;

- g. A description of how Respondent disposed of any emptied materials and/or rinse water; and
- h. Provide any documentation or additional information related to these transactions.

Everett: Because New Monsanto did not identify any relationship between the Everett facility and any drum reconditioning/ recycling companies, New Monsanto did not identify any documents or information relevant to question #2 or its subparts (a)-(h).

Indian Orchard: To the extent that Old Monsanto dealt with Kingston Steel Drum Co., either directly or indirectly, please refer to the response provided to Question 2 in section II of this request. Kingston Drum, a Division of Great Lakes Container Corp., was located at Route 125, Kingston, N.H. 03848. See document bates stamped "IndOrch 0025068". The sales manger for Kingston Drum was Alvin Robbins, whose phone numbers were 800-258-7150 and 603-642-3383. Id.